

Privacy Policy (Last Updated: 25 May 2018)

We, Campbell Harrison, are committed to protecting and respecting your privacy whilst being transparent with you regarding how we process your data. [It is important](#) that you read this notice so you are aware of how and why we use your personal data. If you have any questions or queries contact julie@campbellharrison.co.uk

Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting this Site you are accepting and agreeing to the practices described in this policy.

This policy covers data you may provide to us via the Site only, when you are not an existing client or have a relationship with us. We provide additional details to our clients regarding how we handle their personal data in our separate client agreement, which overrides the provisions of this policy. If you are an employee, further details will be provided in your employment documentation about your data protection rights.

For the purpose of the EU General Data Protection Regulation 2016/679 (the **Data Protection Legislation**), we are the data controller (i.e. the company who is responsible for, and controls the processing of, your personal data) with company registration number 6458008.

Our Data Protection Officer is Julie White.

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1. Information we may collect from you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2. Information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can give authorisation on his/her behalf to the processing of his or her personal data and receive on his/her behalf any data protection notices.

3. Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

4. Uses made of the information

We use information held about you in the following ways:

4.1. Information you give to us

We will use this information:

- 4.1.1. to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- 4.1.2. to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- 4.1.3. to notify you about changes to our service; and
- 4.1.4. to ensure that content from our Site is presented in the most effective manner for you and for your computer.

4.2. Information we collect about you

We will use this information:

- 4.2.1. to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 4.2.2. to improve our Site to ensure that content is presented in the most effective manner for you and for your computer;
- 4.2.3. to allow you to participate in interactive features of our service, when you choose to do so; and
- 4.2.4. as part of our efforts to keep our Site safe and secure.

4.3. Lawful bases for processing

The legal bases for our processing of your personal data are:

- 4.3.1. that we have received your express consent to do so;
- 4.3.2. to allow us to perform a contract that we have entered into with you or to take steps to enter into such a contract;
- 4.3.3. for the purposes of legitimate interests pursued by us or a third party, except where such interests are overridden by your interests, rights or freedoms.

4.4. Information we receive from other sources

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5. Disclosure of your information

5.1. We may share your information with selected third parties including:

- 5.1.1. business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- 5.1.2. analytics and search engine providers that assist us in the improvement and optimisation of our Site; and

5.2. We may disclose your personal information to third parties:

- 5.2.1. in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- 5.2.2. if all, or substantially all, of our assets are acquired by a third party, in which case personal data held by us about our clients will be one of the transferred assets; and
- 5.2.3. if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any other agreements or terms and conditions between you and us; or to protect the rights, property, or safety of our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

6. Cookies

- 6.1. A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website.
- 6.2. We use cookies to better the users experience while visiting the Site. Where applicable this Site uses a cookie control system allowing the user on their first visit to the Site to allow or disallow the use of cookies on their computer and/or device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer and/or device.
- 6.3. Cookies are small files saved to your computer's hard drive that track, save and store information about your interactions and usage of the Site. This allows the Site, through its server to provide the users with a tailored experience.
- 6.4. This Site uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The

software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information <http://www.google.com/privacy.html>.

- 6.5. **Consent:** There is a notice on our home page which describes how we use cookies and which also provides a link to our Privacy Policy. If you use this website after this notification has been displayed to you we will assume that you consent to our use of cookies for the purposes described in this Privacy Policy.
- 6.6. **Third-party cookies:** We work with third-party suppliers who may also set cookies on our Site, for example Twitter, Facebook and LinkedIn. These third-party suppliers are responsible for the cookies they set on our Site. If you want further information please go to the website for the relevant third party.
- 6.7. **How to turn off cookies:** If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org

7. **Where we store your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

8. **Security**

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security or integrity of your data transmitted to our Site and you acknowledge that any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

9. **Data Retention**

- 9.1. The retention periods we follow are as set out on the specific document or information notice we provide at the time we collect your data.
- 9.2. If you are not a client, employee or prospect who has received a separate fair processing notice privacy policy we will retain your data only for as long as we have a lawful basis to do so or need to keep the information to comply with a legal or regulatory obligation, for example under the Financial Conduct Rules.
- 9.3. In some circumstances you can ask us to delete your data: see [Right to be forgotten](#) below for further information.
- 9.4. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. **Your rights**

You have the right to:

- 10.1. **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. Please contact julie@campbellharrison.co.uk to make such a request.
- 10.2. **Request correction** of the personal data that we hold about you. You can access this right by contacting julie@campbellharrison.co.uk. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 10.3. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have

the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- 10.4. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 10.5. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 10.6. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 10.7. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- 10.8. **Complain** you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

11. **Third Party Links**

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

12. **Glossary**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

13. **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. **Contact**

Questions, comments and requests regarding this privacy policy are welcomed, please email julie@campbellharrison.co.uk if you have any queries.