

## PRIVACY NOTICE

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Jane Bailey is committed to protecting and respecting your privacy.

My Privacy Notice tells you what I do with your personal data, why I use it, who I share it with and how long I keep it. As it's your data you have the right to know what happens with it. The types of data that I hold about you and how long I keep it, will depend on your relationship with us and the reasons why I have it.

This policy sets out the basis on which any personal data I collect from you, or that you provide to me, will be processed by me. Please read the following carefully to understand my views and practices regarding your personal data and how I will treat it.

For the purpose of the General Data Protection Regulations and Data Protection Act 2018 (the **Act**), the data controller is Jane Bailey of [janebailey@btinternet.com](mailto:janebailey@btinternet.com).

## **HOW DO I GET INFORMATION?**

Most of the personal information I process is provided to me directly by you for one of the following reasons:

- You have made an information request.
- You booked an appointment or booked to attend / have attended an event.
- You subscribe to my digital newsletter.
- You visited my website and made an account with me, used an online form or commented on a blog post.
- You engaged with me on social media.
- You commented or reviewed on one of my products or services.
- You ordered a product or service from Jane Bailey and financial information was taken to fulfil the order
- You have applied for a job / secondment / internship / apprenticeship with me.
- You are representing your organisation to make an enquiry.
- You have completed a survey or competition that I am delivering or supporting.

### **I also receive information indirectly**

- Details of your visits to my site [including, but not limited to, traffic data, location data, device model and version, operating system, weblogs and other communication data, whether this is required for my own billing purposes or otherwise] and the resources that you access.
- From time to time, I may receive personal information about you from third party sources – for example, partners with whom I offer co-branded services or events, or engage in joint marketing activities, and publicly available sources such as social media websites.

My website is not intended for or targeted at children under 16, and I do not knowingly or intentionally collect information about children under 16. If you believe that I have collected information about a child under 16, please contact me at [janebailey@btinternet.com](mailto:janebailey@btinternet.com), so that I may delete the information.

### **IP ADDRESSES / LOG FILES**

When you use my services or view content provided by me, I automatically collect information about your computer hardware and software. This information can include your IP address, browser type, domain names, internet service provider (ISP), the files viewed on my site (e.g.,

HTML pages, graphics, etc.), operating system, clickstream data, access times and referring website addresses. This information is used by Jane Bailey to provide general statistics regarding use of the Jane Bailey's Website. This is statistical data about my users' browsing actions and patterns and is not used to identify any individual.

#### **WHERE I STORE YOUR PERSONAL DATA**

The data that I 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 me or for one of my 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. I will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

[All information you provide to us is stored on my secure servers. Any payment transactions will be encrypted [using SSL technology].] Where I have given you (or where you have chosen) a password which enables you to access certain parts of my site, you are responsible for keeping this password confidential. I ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although I will do my best to protect your personal data, I cannot guarantee the security of your data transmitted to my site; any transmission is at your own risk. Once I have received your information, I will use strict procedures and security features to prevent unauthorised access.

#### **USES MADE OF THE INFORMATION**

I use information held about you in the following ways:

- To ensure that content from my site is presented in the most effective manner for you and for your device.
- To provide you with information, products or services that you request from me or which I feel may interest you, where you have consented to be contacted for such purposes.
- To carry out my obligations arising from any contracts entered in to, between you and me.
- To allow you to participate in interactive features of my service, when you choose to do so.
- To notify you about changes to my service.

#### **SHARING YOUR INFORMATION**

**I never sell Personal Information to any third party**

I use data processors who are third parties who provide elements of services for us. I have contracts in place with my data processors. This means that they cannot do anything with your personal information unless I have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period I instruct. For example, I use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.

I may send information or Jane Bailey related content to you which I think may be of interest to you by post, email, or other means and send you marketing communications relating to my business. [In the case of loyalty scheme members, I'll also offer you relevant rewards.];

I may promote use of my services to you and share promotional and information content with you in accordance with **your** communication preferences;

I may provide other companies with statistical information about my users -- but this information will not be used to identify any individual user;

I may send information to you regarding changes to my Customer Terms of Service, Privacy Policy (including the Cookie Policy), other legal agreements OR to meet legal requirements. The data privacy law allows this as part of my legitimate interest in understanding my customers and providing the highest levels of service.

Of course, if you wish to change how I use your data, you'll find details in the ['Your Rights' section below](#).

I may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, I do **not** transfer your Personal Information to the third party.

I do not disclose information about identifiable individuals to my advertisers, but I may provide them with aggregate information about my users (for example, I may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). I may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). I may make use of the personal data I have collected from you to enable us to comply with my advertisers' wishes by displaying their advertisement to that target audience.

## **LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION (EEA VISITORS)**

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which I collect it. However, I will normally collect personal information from you only where I have your consent to do so, where I need the personal information to perform a contract with you, or where the processing is in my legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, I may also have a legal obligation to collect personal information from you.

If I ask you to provide personal information to comply with a legal requirement or to perform a contract with you, I will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if I collect and use your personal information in reliance on my legitimate interests (or those of any third party), I will make clear to you at the relevant time what those legitimate interests are.

I may disclose your personal information to third parties:

- If I (or my assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by Jane Bailey on the websites and through service provision. In this event, you will be notified via email and/or a prominent notice on my website, of any change in ownership, uses of your Personal Information, and choices you may have regarding your Personal Information.
- I reserve the right to use or disclose your Personal Information if required by law or if I reasonably believe that use or disclosure is necessary to protect my rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

## **YOUR RIGHTS**

As I am processing your personal data for my legitimate interests as stated above, you have the right to object to my processing of your personal data. There are legitimate reasons why I may refuse your objection, which depend on why I am processing it.

You have the right to ask us not to process your personal information. You can exercise your right to prevent marketing use of your Personal Information by checking tick boxes on the forms I use to collect your data. You can also exercise the right at any time by contacting us at [janebailey@btinternet.com](mailto:janebailey@btinternet.com)

Our site may, from time to time, contain links to and from the websites of my 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 I do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **HOW I PROTECT YOUR PERSONAL INFORMATION**

I know how much data security matters to all my customers. With this in mind, I will treat your data with the utmost care and take all appropriate steps to protect it.

I secure access to all transactional areas of my websites using 'https' technology.

Access to your personal data is password-protected, and sensitive data such as payment card information) is secured to ensure it is protected.

Regularly monitor my system for possible vulnerabilities and attacks.

## **RETENTION OF PERSONAL INFORMATION**

How long I keep information I collect about you depends on the type of information. as described in further detail below. After such time, I will either delete or anonymize your information or, if this is not possible, then I will securely store your information and isolate it from any further use until deletion is possible.

I retain Personal Information that you provide to us where I have an ongoing legitimate business need to do so (for example, as long as is required in order to contact you about a service you have signed up to, or as needed to comply with my legal obligations, resolve disputes and enforce my agreements).

When I have no ongoing legitimate business need to process your Personal Information, I securely delete the information or anonymise it or, if this is not possible, then I will securely store your Personal Information and isolate it from any further processing until deletion is possible. I will delete this information from the servers at an earlier date if you so request, as described in "[To Unsubscribe from my Communications](#)" below.

## **HOW TO ACCESS & CONTROL YOUR PERSONAL DATA**

Reviewing, Correcting and Removing Your Personal Information

You have the following data protection rights:

- You can request access, correction, updates or deletion of your personal information.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- If I have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing I conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about my collection and use of your personal information. Contact details for [data protection authorities in the UK are available here](#).

To exercise any of these rights, please contact us at [janebailey@btinternet.com](mailto:janebailey@btinternet.com) or by mail to [ADDRESS], using the subject title: Privacy. I will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action I have taken.

### **TO UNSUBSCRIBE FROM MY COMMUNICATIONS**

You may unsubscribe from my marketing communications by clicking on the "unsubscribe" link located on the bottom of my e-mails, updating your communication preferences, or by sending us email us at [janebailey@btinternet.com](mailto:janebailey@btinternet.com) with the subject title 'Privacy'.

### **CHANGES TO MY PRIVACY POLICY**

Any changes I may make to my privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Regularly review and, where necessary, update my privacy information.

If I plan to use personal data for a new purpose, I update my privacy information and communicate the changes to individuals before starting any new processing.

### **CONTACT**

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to [janebailey@btinternet.com](mailto:janebailey@btinternet.com)