

# **Webnetism Privacy Policy**

Version	2.0
Last amended	16 <sup>th</sup> January 2018



Introduction	3
How we use your personal data	3
Providing your personal data to others	4
Retaining and deleting personal data	4
Amendments	5
Your rights	5
Third party websites	5
Personal data of children	5
Updating information	5
Our details	5
Data protection officer	6
	Introduction How we use your personal data Providing your personal data to others Retaining and deleting personal data Amendments Your rights Third party websites. Personal data of children Updating information Our details Data protection officer



## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and customers; in this policy we explain how we will handle your personal data.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy. For more information on cookies and our use of cookies, please <u>click here</u>.

#### 2. How we use your personal data

- 2.1 In this Section 2 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
- 2.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system, Google Analytics. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 2.3 We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent.
- 2.4 We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is consent.
- 2.5 We may process information that you provide to us for the purpose of subscribing to our 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.
- 2.6 We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.



- 2.7 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence 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.
- 2.8 In addition to the specific purposes for which we may process your personal data set out in this Section 2, 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. Providing your personal data to others

- 3.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.
- 3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 3.3 We may disclose your contact details to our subcontractors insofar as reasonably necessary for carrying out our services.
- 3.4 In addition to the specific disclosures of personal data set out in this Section 3, we may also 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.

## 4. Retaining and deleting personal data

- 4.1 This Section 4 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.
- 4.2 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.
- 4.3 We will retain and delete your personal data as follows:
  - (a) Contact details including email addresses, names and telephone numbers will be retained for up to 7 years following an enquiry on our website, at the end of which period it will be deleted from our systems.
  - (b) Contact details, including email addresses, names, telephone number and addresses will be retained indefinitely for customers for invoicing purposes.
- 4.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained.
- 4.5 Notwithstanding the other provisions of this Section 4, 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.



## 5. Amendments

- 5.1 We may update this policy from time to time by publishing a new version on our website.
- 5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 5.3 We may notify you of changes to this policy by email or through a message on our website.

## 6. Your rights

- 6.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
  - (a) the payment of a fee (currently fixed at GBP 10); and
  - (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 6.2 We may withhold personal information that you request to the extent permitted by law.
- 6.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 6.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

### 7. Third party websites

- 7.1 Our website includes hyperlinks to, and details of, third party websites.
- 7.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

### 8. Personal data of children

- 8.1 Our website and services are targeted at persons over the age of 18.
- 8.2 If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

### 9. Updating information

9.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

## 10. Our details

- 10.1 This website is owned and operated by Continental Limited.
- 10.2 We are registered in England and Wales under registration number 01727463, and our registered office is at Continental Limited, Herrick Way, Staverton Technology Park, Cheltenham, GL51 6TQ.



- 10.3 Our principal place of business is at Webnetism, Herrick Way, Staverton Technology Park, Cheltenham, GL51 6TQ.
- 10.4 You can contact us:
  - (a) by post, using the postal address given above;
  - (b) using our website contact form;
  - (c) by telephone, on 01452 855558; or
  - (d) by email, using <u>dataprotection@continental.co.uk</u>

### 11. Data protection officer

11.1 Our data protection officer's contact details are: <u>dataprotection@continental.co.uk</u>