##### **Privacy** **Policy**.

#### 1. Important information and who we are

**Purpose of this privacy policy**

This privacy policy aims to give you information on how we collect and process your personal data through your registration to use our services and use of our website, including any data you may provide through our website when you make an enquiry or sign up to marketing updates.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

‘Paul Shears.’ is the controller and responsible for your personal data (collectively referred to as "Paul Shears”, "we", "us" or "our" in this privacy policy).

Our full details are: Paul Shears
Email address: hello@paulshears.co.uk
Postal address: 40 Sulby Drive, Lancaster, LA1 4UB

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.

**Changes to our privacy policy and your duty to inform us of changes**

This version was last updated on 16/04/2019 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**Links to third-party websites**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

#### 2. What personal data do we collect?

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 as follows:

* **Identity Data** including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
* **Contact Data** including billing address, delivery address, email address and telephone numbers.
* **Financial Data** including bank account and payment card details.
* **Transaction Data** including details about payments to and from you and other details of products and services you have purchased from us.
* **Technical Data** including 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 our website.
* **Profile Data** including purchases or orders made by you, your interests, preferences, feedback and survey responses.
* **Usage Data** including information about how you use our website, products and services.
* **Marketing and Communications Data** including 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 policy.

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 products 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.

#### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

* Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
	+ request our products or services
	+ subscribe to our publications
	+ request marketing to be sent to you
	+ enter a competition, promotion or survey
	+ give us some feedback
* Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy [LINK] for further details.
* Third parties or publicly available sources. We may receive personal data about you from various third parties (and public sources) as set out below:
	+ Technical Data from analytics providers (such as Google based outside the EU) or Contact, Financial and Transaction Data from providers of technical, payment and delivery services (such as PAYPAL based outside the EU)
	+ Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

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

Any user of our website can be assured that we only ever collect information that will help us make the site work better for you; information that will let us contact you if you've asked us to, let us give you accurate local information if you need it and give us a sense of how our visitors are using the site, so we can keep improving it.

Most commonly, we will use clients personal data in the following circumstances:

* To contact you in relation to your initial enquiry
* To register you as a new client
* To enable us to provide services to you as a client
* To process payments for products or services provided to you
* To manage our relationship with you, including notifying you of services which may be beneficial to your business or organisation, notifying you about changes to our terms or privacy policy, asking you to leave a review or take a survey, and/or to enable you to partake in a prize draw or competition
* To send further information to you about the services Paul Shears provides and/or information about the services of our associates
* To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.

Other less common ways we may use your personal data are listed below:

* To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
* Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [**contacting us.**](http://www.paulshears.co.uk/contact)

**Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

**Promotional offers from us**
We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need for your business or organisation, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us and, in each case, you have not opted out of receiving that marketing.

**Third-party marketing**
We will never share your information with other organisations for marketing, market research or commercial purposes, and we don't pass on your personal information to any other websites or third parties without your express permission.

**Opting out**
You can ask us or third parties to stop sending you marketing messages at any time or adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

**Cookies**
You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please [**click here.**](http://www.theadamco.uk/cookie-policy)

**Change of purpose**
We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [**contact us.**](http://www.paulshears.co.uk/contact)

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

#### 5. Disclosures of your personal data

We may have to share your personal data with the external third parties set out below for the purposes set in paragraph 4 above:

* Service providers (acting as processors) based in the United Kingdom who provide IT and system administration services.
* Professional advisers including lawyers, bankers, auditors and insurers based England or Scotland who provide consultancy, banking, legal, insurance, debt and accounting services.
* HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
* Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### 6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

#### 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### 8. Data retention

**How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for legal and tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

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.

#### 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

* **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.
* **Request correction** of the personal data that we hold about you. 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.
* **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.
* **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.
* **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.
* **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.
* **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.

If you wish to exercise any of the rights set out above, please [**contact us.**](http://www.paulshears.co.uk/contact)

**No fee usually required**
You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**What we may need from you**
We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**
We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated