

## **DATA AND COOKIES POLICY**

**THE PAGE DESIGN CONSULTANCY LIMITED** also known as the Page Design is registered at Companies House (number 06012930) and our registered office is at Mainwood Farm, Kneesall, Newark, England, NG22 0AH ('we, us or the Page Design'). Our correspondence address is:-

The Old Pumping Station  
Great Northern Terrace  
LINCOLN  
Lincolnshire  
LN5 8HN

### **Introduction**

The Page Design is a 'controller' of personal data for the purposes of the Data Protection Act 2018 and the EU General Data Protection Regulation (**GDPR**).

We may control and process your personal data and take your privacy very seriously. We are committed to keeping your data secure and processing it fairly and lawfully. The information set out below explains how we process your personal data.

### **Personal data we may collect about you**

We may collect personal data about you when you make contact with us whether by email or telephone.

This information is likely to include:-

- Your name and contact details (address, email and phone number)
- Your job title
- Any payment information needed to processing payments, including:-
  - credit/debit card numbers,
  - security code numbers
  - billing information
- Any other personal data that might be required as part of our contractual relationship with you.

We also monitor your use of our website through the use of cookies and other tracking devices including how often you visit our website and which pages you view; traffic data, location data and the originating domain name of a user's internet service provider. We use this information to better understand those wanting our services. Some of this data will be aggregated or statistical, so that we will not be able to personally identify an individual.

### **How we use your personal data**

We may use your data for one or more of the following:-

- Communicating with you and your business about our services and any projects, e.g. by responding to enquiries and/or providing you with advice and assistance;

- Planning, performing and managing the (contractual) relationship with you and your business;
- Administrating and performing customer surveys, marketing campaigns, market analysis, contests, or other promotional activities or events, where you have specifically consented;
- Maintaining and protecting the security of our products, services and websites, preventing and detecting security threats, fraud or other criminal or malicious activities;
- Ensuring compliance with legal obligations (such as record keeping obligations), and resolving disputes, enforcing our contractual agreements and to establish, exercise or defend legal claims.

The legal basis for using your personal data is:

- The performance of any contract we make with you;
- Complying with our legal obligations; and/or
- If it is necessary for our legitimate interests and that will generally be the efficient performance or management of our business relationship with you.

We may also ask for your consent to some uses of your personal data, in which case the legal basis for using your data will be that you have consented.

#### **Marketing and opting out**

We will not contact you with direct marketing unless you have asked us to do so and even then you can change your mind later and opt-out on request.

#### **Who has access to your personal information?**

We will not sell or rent your information to third parties, nor do we share it with third parties for marketing purposes.

**Third Party Service Providers working on our behalf:** We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

We will not pass your personal information to other third parties unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

We may transfer your personal information to a third party if we are required to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our business terms. However, we will take reasonable steps to ensure that your privacy rights continue to be protected.

## **Keeping your data secure**

We will use technical and organisational measures to safeguard your personal data, for example:

- Access to our systems is controlled by password and username which are unique to the user;
- We store your electronic personal data on secure servers;
- We store your paper records in locked storage rooms;
- We train our staff in good records management

We do not collect or process sensitive data about you. Any non-sensitive data including your contact details are transmitted normally over the Internet, and while we will try to protect your personal data we cannot guarantee that this is completely secure, or that of any information you transmit to us; and therefore do so at your own risk.

## **Transferring your information outside of Europe**

We do not transfer your data outside of the European Economic Area.

## **How long do we keep your data for?**

We will not keep your data for any longer than is necessary to complete any project or provide you with services and which is usually six years from when our work finishes.

## **Cookies**

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. If you use our website, we may use cookies to:

- Track your use of the site;
- Recognise you whenever you visit this website;
- Obtain information about your preferences, online movements and use of the internet;
- Carry out research and statistical analysis to help improve our content, products and services and to help us better understand our visitor/customer requirements and interest;
- Target our marketing and advertising campaigns more effectively;
- Make your online experience more efficient and enjoyable.

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](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to the use of cookies. This includes cookies that are essential in order to enable you to move around the site and use its features and cookies that are not essential but gather information about your use of the site.

## **Your data subject rights**

You have the following rights under the GDPR and any request should be made in writing to the address below:

**Subject Access Requests (SAR):** You have the right to ask us to confirm what information we hold about you at any time and you have the right to access to it by making a SAR; there is no charge for making a request. You can also ask us to modify, update or delete such information however if we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

**Right to object:** You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.

**Right to withdraw consent:** In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later.

**Right to erasure:** You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected.

**Right of data portability:** You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.

**Right to complain to the Information Commissioner:** You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)). This website has further information on your rights and our obligations.

To exercise any of your rights above please send an email to [info@thepagedesign.co.uk](mailto:info@thepagedesign.co.uk) or write to us at our correspondence.

#### **Review**

This Policy was last reviewed in October 2018 and we may change it from time to time. The latest version will apply each time you visit our website.

If you have any questions about this Policy, or about how we look after your data generally, you can contact us via our contact page