

# Privacy Policy

## *Who we are*

Our website address is: <http://www.jamesboughey.com>

## *What personal data we collect and why we collect it*

**Sensitive Data about you** - We do not collect any Sensitive Data about you. Under the GDPR sensitive data refers to data that 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, we have no need to collect this data so don't

**How we obtain your data** - Often we collect data from you by you providing the data directly to us i.e filling in a contact form on our website or entering a competition. However we may automatically collect certain data from you as you use our website by using cookies and similar technologies.

We will also receive data about you from 3rd party companies such as Google where we access their analytics platform, and Facebook where we use their display network, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

## *How we process your data*

From the data you share on this website we may process the following categories of personal data about you:

— **Customer Data** this includes data relating to any purchases of goods/services including but not limited to your name, title, billing/delivery address, email address, phone number, contact details, purchase details and your card details. We will only use this data to provide you with the goods and/or services you have purchased and to keep records of such transactions for our records. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

— **Communication Data** this includes but is not limited to any communication that you send to us through our website, through email, text, social media messaging, social media posting, online chats or any other communication that you send us. We process this data for the purposes of communicating with you, for record

keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

— **Technical Data** this includes but is not limited to data about your use of our website and online services such as your IP address, any login data, information regarding your choice of browser, length of visits to webpages, your journey through our website, how often you revisit the site time zone settings and other technology on the devices you use to access our website.

The source of this data is from our analytics tracking system, we process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our marketing. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly maintain our website and help our business and to grow and define a marketing strategy.

— **Marketing Data** this includes but is not limited to data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this marketing. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display marketing on platforms including but not limited to YouTube, Instagram, Twitter, Google ads display) and to measure or understand the effectiveness of the marketing you see. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

— **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website effectively and ensure relevant content is provided to you. Like all companies to ensure the security of our website we maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us

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to properly administer our website and our business to grow our business and to decide our marketing strategy.

## Comments

When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection.

An anonymized string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: <https://automattic.com/privacy/>. After approval of your comment, your profile picture is visible to the public in the context of your comment.

## Media

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

## Cookies

If you leave a comment on our site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

## Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

## Who we share your data with

We may have to share your personal data with the parties set out below:

- Other companies in our group who provide services to us.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the GDPR and other Laws.

We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions and we will always have a legitimate reason for doing so.

## How long we retain your data

The data we collect from you will be retained only for as long as necessary to fulfil the purposes we collected it for. This will naturally include the purposes of satisfying any legal, accounting, or reporting requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers. In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

## What rights you have over your data

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If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

## *Where we send your data*

Visitor comments may be checked through an automated spam detection service.

## *How we protect your data*

We have put in place significant security measures to prevent your personal data from being breached. This includes your data being lost, used, altered, disclosed, or accessed without authorisation.

We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential and all employees have signed a Non Disclosure agreement to this effect.

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

## *Your legal rights*

GDPR gives you the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

If you want to know more about your rights please take a look at the ICO website link provided here:  
<https://ico.org.uk/>

If you wish to exercise any of the rights set out above, please email us at [art@jamesboughey.com](mailto:art@jamesboughey.com)