

## Privacy policy

Effective 30 April 2021

### 1.0 Introduction

This privacy policy sets out what personal data StrawberryFinch Limited collects from you, how and why we do it, the lawful basis upon which we process it, who we share it with and how you can access it or ask us to amend or destroy it.

We are committed to ensuring that your privacy and personal data are protected. Should we ask you to provide certain information by which you can be identified then you can be assured that it will only be used in accordance with this privacy policy. We may change this policy from time to time so you should check back here from time to time to ensure that you are happy with any changes.

### 2.0 What personal data do we collect?

We do not collect or hold any sensitive personal data as defined by the General Data Protection Regulation, 2018. The type of data we collect differs depending on what type of business relationship you already have with us. So if you are in one of the groups below we may collect some or all of the information.

#### 2.1 If you are a client

We may collect your name, job title, business and home address, phone numbers, email addresses, names of spouse and children, IP addresses, device specific information like your browser version details, demographic, geo-location, cookie details, behaviour, preferences, interests, professional or academic career, social connections and feedback on the quality of our service, either on an ad hoc basis or as the result of undertaking research.

#### 2.2 If you are a supplier

We may collect your name, job title, business and home address, phone numbers, email addresses, bank account details, names of spouse and children, IP addresses, demographic, geo-location, cookie details, behaviour, preferences, interests, professional or academic career, social connections and feedback on the quality of our service, either on an ad hoc basis or as the result of undertaking research.

### **3.0 How do we collect your personal data and where does it come from?**

You may give this to us in person, verbally over the phone, by conference call, webinar, face-to-face, or by chat box, messaging app, text, email, or social media. It could also be information we get from you when you use our website and collected by using cookies, tracking and analytics software. Or it could be from your own website(s), any of your social media accounts or other publicly accessible sources.

### **3.1 We use cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to your needs.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

Most web browsers automatically accept cookies, but you can usually modify your browser setting to block cookies if you prefer. Although this may prevent you from taking full advantage of the website.

### **3.2 We use analytics software**

We also use analytics software to build profiles of visitors to our website based on their IP address, geo-location, and the actions they take when interacting with our website. We also use software to track repeat visits by appending action data to a previous visitor's IP address. Your email address and social media profile can also be appended to this visitor profile if you click through from one of our outbound emails, subscribe to our email list, complete a form on our website or engage with us via our chat box. This enables us to identify you as an individual and to provide you with a higher quality and a more personalised experience.

### **3.3 Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.

#### **4.0 What is the purpose for collecting your personal data?**

We aim to provide clients with a high quality, personalised services based on a professional business relationship. The specific purposes varies depending on the relationship you have with us.

#### **5.0 What do we do with your personal data? (ie. how we process it)**

We store your personal data in our digital address book, CRM, studio workflow and accounting systems, website chat box and email broadcast program.

We use a number of different software applications and Software as a Service (SaaS) providers with servers based around the world and your personal data could be stored and processed on one of our computers, on our phones or locally in the UK, Europe or on a server in a country outside of where you live.

#### **6.0 What is the lawful basis upon which we process your personal data?**

We act as data controllers in that we determine the purposes and the means of processing your personal data. As as a small commercial organisation employing less than 250 people, we are also data processors in that we use your information to efficiently administer our business. This involves holding your personal data for legitimate business reasons, eg. communicating with you my phone, email, text and by post, fulfilling our contractual obligations and contractual transactions with individuals and companies, including our compliance with HMRC and Health & Safety regulations.

The processing enables us to enhance the quality of our service, to modify or to personalise it in some way as to improve your overall experience. Or to provide you with improved benefits including the following and to;

- Better understand how you interact with our website
- Send you information about design, branding and marketing issues that might be of interest or benefit to you
- Introduce us and our services to you, including trusted third parties that might be useful to you
- Analyse the effectiveness of our marketing communications or campaigns
- Identify and prevent fraud

There may be up to four different lawful basis upon which we process your personal data and these are;

**Contract**

Such processing is necessary in order to enter into or perform a contract with you to provide you with a high quality service.

**Legitimate interest**

It is in our legitimate interest to communicate with you and you would reasonably expect us to use your personal data to learn more about you before, during and after making contact.

**Consent**

You have consented to the processing of your personal data for specific purposes.

**Legal**

Under certain circumstances we are required by law to process your personal data, to comply with, but are not limited to HMRC and Health & Safety regulations or to identify and prevent fraud.

Type of business relationship you have with us	Lawful basis		
	Contract	Legitimate interest	Consent
<b>Clients</b>			
Carry out tasks on your behalf	Yes		
Provide you with high quality service(s) and an outstanding experience whenever and however you are in contact with us	Yes		
Keep accurate records	Yes		
Understand your needs better by using research, so we can improve the quality of our service(s) or propose new ways of working with you		Yes	
Invite you to events, presentations or meetings to share our expertise or knowledge and to strengthen our business relationship		Yes	
Inform you about new services or introduce you to ones from trusted third parties that may be useful to you		Yes	
Help you to build a stronger and fitter brand by sharing our insights and experience, direct to your inbox		Yes	
<b>Prospective clients</b>			
Keep accurate records		Yes	
Provide you with an outstanding experience whenever and however you are in contact with us		Yes	
Help you to build a stronger and fitter brand by sharing our insights and experience, direct to your inbox			Yes
Invite you to events, presentations or meetings to share our expertise or knowledge with you			Yes
Understand your needs and introduce you to service(s) that may be useful to you			Yes
<b>Suppliers</b>			
Introduce ourselves and our services(s) to you		Yes	
Provide an outstanding experience whenever and however you are in contact with us		Yes	
Collaborate with you to provide a high quality service to our clients or introduce you directly to them	Yes		
Be able to pay you for your service(s)	Yes		

## 7.0 Respecting your personal data rights

Whenever we process information for the above purposes we always respect your personal data rights, which include the right to be informed, the right of access, the right of rectification, the right of erasure, the right to restrict processing, the right to data portability, the right to object and the right not to be subjected to automated decision-making including profiling.

	Your rights						
Lawful basis	Access	Rectification	Restrict processing	Erasure (to be forgotten)	Data portability	Object	Withdraw
Contract	Yes	Yes	Yes	Yes	No	No	Yes
Legitimate interest	Yes	Yes	Yes	Yes	No	Yes	Yes
Consent	Yes	Yes	Yes	Yes	No	No	Yes
Legal	Yes	Yes	No	No	No	No	No

## 8.0 How long do we hold your personal data?

Unless you ask us to destroy your personal data, we will hold it whilst we have a business relationship with you. At each financial year end, we archive non-active records and keep these for at least seven years.

## 9.0 Maintaining the security of your personal data (ie. breaches)

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your personal data.

We have installed an SSL certificate on our website to encrypt any personal data that you provide us. We review our information collection, storage and processing practices, including security measures to mitigate the risk of unauthorised access to our systems.

We use desktop, laptop and mobile computers to store your personal data and some paper based records are stored .

## **10. Who we share your personal data with**

We will never sell, distribute or lease your personal data to third parties unless we have your permission or are required by law to do so.

Your personal data is restricted to StrawberryFinch employees, trusted independent consultants, freelancers, contractors or suppliers who need to have the information in order to process it and are subject to contractual confidentiality obligations and may be disciplined or their contracts terminated if they fail to meet these obligations.

### **10.1 If you are an existing or prospective client**

We will only share your personal data with employees, trusted independent consultants, freelancers and suppliers for the purpose of providing you with a high quality service and in compliance with this privacy policy and other appropriate confidentiality and security measures. We will also share your personal data to help us to detect, prevent or address fraud, security or technical issues or protect the rights, property or safety of StrawberryFinch as required by law.

### **10.2 If you are a supplier**

We will only share your personal data with StrawberryFinch employees, with existing or prospective clients or other trusted independent consultants, freelancers or suppliers for the purpose of providing a high quality service to our clients and in compliance with this privacy policy and other appropriate confidentiality and security measures. We will also share your personal data to help us to detect, prevent or address fraud, security or technical issues or protect the rights, property or safety of StrawberryFinch as required by law.

## **11.0 Requesting access to your personal information**

If you think we have not respected your personal data rights, wish to restrict or to object to the way we process your personal data, to amend or destroy your personal data or simply to request details of the personal data which we hold about you under the General Data Protection Regulation, 2018, then email Craig Thatcher at StrawberryFinch and we will respond within one month.

**PLEASE NOTE:** There is no charge for providing you with a copy of your personal data. We can refuse or charge you a reasonable fee if your request is unfounded or excessive. If we refuse your request we will tell you within a month why we have refused it.

You also have the right to complain to the Information Commission's Office, [www.ico.org.uk](http://www.ico.org.uk), if you think there is a problem with the way we are handling your personal data or seek a judicial remedy.