

## Gegladod Ltd Privacy Policy

### 1. Introduction

This policy applies where we are acting as a data controller with respect to your personal data, in other words, where we determine the purposes and means of the processing of such personal data. It covers our website, printing processes, email and written communication.

Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it.

### 2. How we use your personal data

In this section we outline how we may process your personal data. All personal data we process falls into one or more of the following categories:

Order data

Transaction data

Financial data

Usage data

Communication data

Enquiry data

Digital marketing data

We may process your order data ("order data"). The order data may include your name, billing address, delivery address, phone number and email address. The order data will be processed for the purposes of delivering your orders to you. The legal basis for this processing is the performance of a contract between you and us.

We do not process personal financial information ("financial data"). All personal payments made online are made through Paypal and Gegladod Ltd. Any organisational financial information will be saved in a secure location or in a password protected digital environment. This financial data may be processed for the purposes of delivering your services to you or for the normal business of Gegladod Ltd. for accounting purposes etc. The legal basis for this processing is the performance of a contract between you and us.

We may process your transaction data ("transaction data"). The transaction data may include information relating to your previous transactions, including purchases of goods or services and Angel payments. The transaction data may include your name, billing address, delivery address, telephone number, email address and purchase history. It may be processed for the purposes of supplying the purchased goods or services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us.

We may process data about your use of our website, and reaction to our emails and services ("usage data"). The usage data may include your 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 sources of the usage data are our analytics packages (including, but not limited to Google Analytics, Google Tag Manager and Google Ads) and email service providers. This usage data may be processed for the purposes of analysing the use of the website, emails and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

We may process information contained in any enquiry you submit to us regarding goods and/or services ("enquiry data"). This enquiry data may be processed for the purposes of providing clarification, resolving issues or marketing relevant goods and/or services to you. The legal basis for this processing is the performance of a contract between you and us and to ensure we are responding to your enquiry.

We may process any of your personal data identified in 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.

We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

Please do not supply any other person's personal data to us, unless we prompt you to do so. If you do share your friends' details with us, please ensure you have their authorisation.

If you wish to opt out of cookies select deny on the cookie consent. If you wish to opt out of google analytics in general Google provides a browser add-on to enable this at <https://tools.google.com/dlpage/gaoptout/> .

### 3. Providing your personal data to others

We do not, and will not, sell any of your personal data to any third.

However, we may disclose your personal data with the following categories of companies as an essential part of being able to provide our services to you, as set out in this policy:

To our insurers and professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.

We use a Twitter Tweet widget at our website. As a result, our website makes requests to Twitter's servers for you to be able to tweet our webpages using your Twitter account. These requests make your IP address visible to Twitter, who may use it in accordance with their data privacy policy: <https://twitter.com/en/privacy#update>

We embed a Facebook widget to allow you to see number of likes/shares/recommends and "like/share/recommend" our webpages. This widget may collect your IP address, your web browser User Agent, store and retrieve cookies on your browser, embed additional tracking, and monitor your interaction with the widget, including correlating your Facebook account with whatever action you take within the widget (such as "liking/sharing/recommending" our webpage), if you are logged in to Facebook. For more information about how this data may be used, please see Facebook's data privacy policy: <https://www.facebook.com/about/privacy/update>

To companies approved by you, such as Facebook and other social media sites (if you choose to link your accounts to us)

To companies involved in delivering your order (usually Royal Mail or Evri)

Financial transactions relating to our website are handled by our card payment service providers. We will share transaction data with our payment service providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data with law enforcement and fraud prevention agencies, so we can help tackle fraud or where such disclosure is necessary for compliance with a legal obligation to which we are subject, in order to protect your vital interests or the vital interests of another natural person, or in connection with the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative out-of-court procedure.

#### 5. How long we retain your data

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.

Whilst you are an active customer (which, for the avoidance of doubt, means you have purchased an item from us) we will retain your data for as long as needed to give you the best possible customer service.

In certain circumstances we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, to resolve disputes and enforce our agreements.

## 6. Your rights

You have a number of rights in respect to your personal data. We have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights. You may exercise any of your rights in relation to your personal data by either (a) >

**A. Right of access** You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge. In order to fulfil this right we will ask for government registered ID to confirm your identity and, once this is received, will respond with the relevant information one calendar month from the date of your request.

**B. Right to rectification** You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

**C. Right to erasure** In certain circumstances you have the right to the erasure of your personal data without undue delay. However, there are exclusions of the right to erasure, such as where processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, or for the establishment, exercise or defence of legal claims. If you have entered into a transaction with us, we will keep a record of your personal data for a minimum of 7 years following the date of your last transaction with us. For the purpose of tracking individuals/organisations who have purchased licences from us to use our materials we will keep the data of the licensee until we are informed by the licensee wants to end the licence. We will endeavour to respond to your request within one month, but if your request is complex or we receive a number of similar requests at the same time, it might take us longer, in which case we will inform you within one month of the receipt of the request and explain why we think an extension is necessary.

**D. Right to restriction on processing** In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: (a) you contest the accuracy of the personal data, (b) processing is unlawful but you oppose erasure, (c) we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims, and (d) you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: (a) with your consent, (b) for the establishment, exercise or defence of legal claims, (c) for the protection of the rights of another natural or legal person, or (d) for reasons of important public interest.

**E. Right to objection to processing** You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: (a) the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or (b) the purposes of the legitimate interests pursued by us or by a third party. If you make such an

objection, we will cease to process the personal information unless (a) we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or (b) the processing is for the establishment, exercise or defence of legal claims.

You also have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

**F. Right to data portability** In certain circumstances, you have the right to receive your personal information in a structured, commonly used and machine-readable format and to transmit that information to another controller to enable it to use the data. The right to data portability applies (a) to personal data you have provided to us as data controller, (b) where the processing is based on the your consent or for the performance of a contract and (c) when processing is carried out by automated means. If you request this information, we will transmit the data directly to another controller, if this is technically feasible. We are, however, not required to adopt or maintain processing systems that are technically compatible with other controllers. Also, if the personal data concerns more than one individual, we must consider whether providing the information would prejudice the rights of other individuals.

If you exercise your right to data portability, we will endeavor to respond to your request within one month, but if your request is complex or we receive a number of similar requests at the same time, it might take us longer, in which case we will inform you within one month of the receipt of the request and explain why we think an extension is necessary.

**I. Right to complain** In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance using the contact us form and we will endeavour to deal with your request as soon as possible. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. Our supervisory authority is the Information Commissioner's Office. You can contact them here: <https://ico.org.uk>

**8. Cookies** We use cookies on our website. For more information on cookies, please see our cookie information: [www.gegladod.co.uk](http://www.gegladod.co.uk)

**9. Amendments** We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy.

**10. Data Protection Officer** If you have any concerns or questions about how we protect your privacy, please contact the company using the contact us form.