# PRIVACY POLICY

Your privacy is important to us. We are committed to protecting your personal data.

This privacy policy

- provides information about the personal data we collect, and how and why we collect, store, use and share your personal data; and
- tells you about your rights in relation to your personal data and how to contact us or supervisory authorities if you have a complaint.

'Personal data' is any information that can directly or indirectly identify an individual ('a data subject').

Zoe Sadler is the data controller. This means that she determines the purposes for which, and the way in which personal data are processed. As a data controller she will comply with all applicable data protection laws.

Should you have concerns about the way we process your data or would like us to stop processing your data please contact Zoe Sadler at zoe@zoesadler.com.

# 1.0 WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

We may collect and process the following personal information:

- a. Identity Data which includes first name, last name, username or similar identifier, title, date of birth
- b. Contact Data includes billing address, delivery address, email address and telephone numbers
- c. Financial Data includes bank account and payment card details
- d. Profile Data includes your username and password, purchases or orders made by you
- e. Marketing and Communications Data includes your preferences in receiving marketing information from us and our third party agents and your communication preferences
- f. Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- g. Technical Data includes 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.
- h. Any other information, which you provide to us.

We do not collect any special categories of personal data (which include sensitive personal information such as details about your race, ethnicity, religious beliefs, political affiliation and sexual orientation).

## 2.0 HOW WE COLLECT PERSONAL DATA

We collect most of this information from you directly, for example, Identity Data, Contact Data, Financial Data and Transaction Data when you fill in forms, correspond with us by email, phone, post or otherwise when you:

- purchase products and/or services from us; directly or through Etsy or Squarespace (our online shop sites)
- subscribe to our e-newsletter
- request marketing, promotional material or information to be sent to you; or
- give us some feedback.

We may also collect information from

• automated technologies, such as cookies which collect Technical Data about your equipment and browsing activities;

- publicly accessible sources, such as Companies House;
- providers of technical, payment and delivery services, such as PayPal or DHL
- analytics providers [such as Google, based outside the EU];
- a third party with your specific consent (e.g. your bank or third party marketing lists);

# 3.0 HOW WE PROCESS YOUR PERSONAL DATA

a. <u>Processing an order:</u>

If you order products or services from us we process identity, contact, financial, profile and transaction data.

Our Approach to Marketing			
Our Website does not contain third party advertising. We may collect identity data about you to send you updates on our products or services if you have commissioned us or ordered products from us. We do not permit third party advertising (or targeted advertising) on our website. If you click on links to our social media pages, or to any third-party website, you may be subject to targeted marketing via that site.	Where we have obtained your specific consent (e.g. when you subscribe to our e-newsletter), we may engage in direct marketing, such as sending you e-mails and/or brochures/other relevant marketing collateral to inform you of our services. We provide these communications on the basis that you have asked to receive these. If you change your mind, you may opt-out at any time via the unsubscribe feature that appears in our e-mails or by emailing zoe@zoesadler.com.	We will not share with any third party the personal information that we obtain about you for the purposes of marketing unless you have provided your specific consent for us to do so and those third parties have agreed to make no independent or further use of that data and to maintain its confidentiality.	
Our Social Media Pages			
This Website contains links to our social media pages on Facebook, Twitter, Instagram, You Tube, Pinterest and Patreon. These third-party websites have their own respective privacy policies (which we would advise you to read) for which those sites are solely responsible. Should you visit those social media pages and choose to follow us on Facebook, Twitter, Vimeo or	If we do receive any personal information about you from these third party social media sites, we will not process your information for the purposes of direct marketing unless you have provided your consent, or it is otherwise lawful for us to do so (e.g. you have previously commissioned us or bought something from us). If you have opted-in to receive such communications, please see our	We will not share your personal information with any third party for the purpose of marketing unless you have provided your consent for us to do so. If you would like us to delete the personal information that we have received about you from these sites, please email us at zoe@zoesadler.com. If you do not want us to receive further information about you from	

LinkedIn, we may receive identity, contact or transaction data from the social media providers, including:	section above on "Our Approach to Marketing".	these sites, you should also contact the sites directly to turn off the 'follow' setting.
• Name;		
• Address (email and/or postal);		
• Telephone number(s);		
• IP address;		
• Social media account URL;		
• Date of birth; and/or		
• gender.		

# 4.0 COOKIES & ANALYTICS

Our website uses cookies and other mechanisms to collect log and analytical information, to help analyse how visitors use the site and to compile statistical reports on visitor activity.

Our Website also uses website analytics, including Google Analytics, to evaluate and improve our Website, personalise your experience and to offer the best, most accessible service possible to all our visitors.

To find out more about Google Analytics and to learn how to opt out, please visit:

- How Google uses data when you use our partners' sites or apps, or
- <u>https://tools.google.com/dlpage/gaoptout/</u>.

When you visit our Website, these analytics service providers may collect the following data, which will almost always be anonymised and aggregated before reporting back to us:

- number of visitors to our Website;
- pages visited while on the Website and time spent per page;
- page interaction information, such as scrolling, clicks and browsing methods;
- websites where visitors have come from and where they go afterwards;
- page response times and any download errors;
- other technical information relating to end user device, such as IP address or browser plug-in.

We process this information to understand how visitors use our Website and to compile statistical reports regarding that activity (for example, your IP address is used to approximate the country from which you access our Website, and we aggregate this information together, so we know that, for example, most of the visitors to our Website come from England).

This processing is crucial to the running of our online business and we therefore undertake such monitoring in the pursuit of our legitimate interests in improving our Website to provide a better service and source of information to visitors.

This information is not used to develop a personal profile of you.

## 5.0 YOUR RIGHTS IN RELATION TO THE PERSONAL DATA THAT WE PROCESS

You have the following rights over the way we process personal data relating to you. We aim to respond as soon as practicable but within one month at the latest. We do not charge a fee to respond to your request:

- to ask for a copy of data we are processing about you and have inaccuracies corrected;
- to ask us to restrict, stop processing, or to delete your personal data;
- to request a machine-readable copy of your personal data, which you can use with another service provider;

To make a request in relation to any of your rights, please email us at zoe@zoesadler.com

#### 6.0 CHILDREN

We do not knowingly use the Website to solicit data from or market to children under the age of 13.

If a parent or guardian becomes aware that his or her child has provided us with information or may be receiving communications from us without consent of a parent or guardian, we ask that this be brought to our immediate attention. We will make it our priority to address this situation and delete information relating to a child as soon as practicable. In such an event, please contact us at zoe@zoesadler.com.

# 7.0 SECURITY

We will take commercially reasonable, appropriate technical and organisational measures to ensure a level of security appropriate to the risk that could be encountered if you use our website and services, taking into account the likelihood and severity those risks might pose to the rights and freedoms of our Website visitors.

In particular, we will take precautions to protect against the accidental or unlawful destruction, loss or alteration, and unauthorised disclosure of or access to the personal information transmitted, stored or otherwise processed by us. Please be aware that, while we make the security of our Website and your personal information a high priority and devote considerable time and resources to maintain robust IT security, no security system can prevent all security breaches. When you choose to share your personal information with us, you accept that you provide your information at your own risk.

### 8.0 RETENTION

In accordance with data protection laws and good commercial practice, we do not retain data in a form that permits identification of the person(s) to whom it relates for any longer than is necessary. Once the purpose for which information has been collected has been fulfilled, we will either permanently delete your personal information or remove all identifiers within it so that it is no longer personal data. We may use such anonymised data for research and/or business analysis purposes.

If you would like us to stop using your personal information, please email us at zoe@zoesadler.com.

### 9.0 INTERNATIONAL DATA TRANSFERS

Our servers are located in the UK, and the information that we collect directly from you will be stored on these servers.

We may also transfer your personal data outside the EU:

• Our third-party service providers, many of whom may be located outside of the EU, operate from multiple locations including non-EU based operations or engage sub-processors located outside the EU.

There are agreements in place to ensure that any international transfers of personal data to our third-party service providers have appropriate safeguards that meet the requirements of EU data protection laws.

## 10.0 CHANGES TO THIS POLICY

This privacy policy may be updated from time to time. We will notify you of any changes to our privacy policy by posting the new privacy policy on our website. You are advised to consult this privacy policy webpage regularly for any changes.

#### 11.0 COMPLAINTS

We hope that we can resolve any query or concern you may raise about our use of your information. You have the right to make a complaint at any time to the Information Commissioner's Officer (ICO), the UK Supervisory Authority for data protection issues: <u>https://ico.org.uk/</u>. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance at zoe@zoesadler.com.