

## DATA PRIVACY NOTICE

Linda Kavanagh, sole trader.

### 1. PURPOSE OF THIS NOTICE

This notice describes how we collect and use personal data about you, in accordance with how the processing of data is governed by the General Data Protection Regulations (the GDPR). Personal data relates to a living individual who can be identified from the data.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

### 2. ABOUT US

I, Linda Kavanagh, am the data controller (contact details below). This means I am responsible for managing how your personal data is processed and for what purposes. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

### 3. HOW DO WE PROCESS YOUR PERSONAL DATA?

I comply with obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure by ensuring appropriate technical measures are in place to protect personal data. I will not collect or process any data that I do not need in order to operate and provide my services. We obtain personal data about you, for example, when:

- you contact us by email, telephone, post (for example when you have a query about our services); or
- you request a proposal from us in respect of the services we provide;
- you OR your employer OR our clients engages us to provide our services and also during the provision of those services;

### 4. THE KIND OF INFORMATION WE HOLD ABOUT YOU

The information we hold about you may include the following:

- your personal details (such as your name and/or address);
- your bank account details for payment and accounting purposes;
- details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
- details of any services you have received from us and details from the provision of those services;
- our correspondence and communications with you;
- information about any enquiries you make to us;

## 5. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

We may process your personal data for purposes necessary for the performance of our service agreement with you OR your employer OR our clients and to comply with our legal obligations. We will use your personal data for the following purposes:

For visitors to our website: Our company is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to market our products and services to you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall. When you visit our website or conduct a transaction on our website, as part of the process, we collect personal information you give us such as your name, address and email address. Your personal information will be used for the specific reasons stated above only. Our website uses cookies to optimise your visitor experience. Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved. Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website and provide analytics
- to record whether you have seen specific messages we display on our website
- to keep you signed in our site

For enquirers, clients and former clients: We process your personal data, including names, addresses, session notes and contact details and in some circumstances business information in order to legitimately administer potential or actual services to you, including processing for business development and management purposes.

We may also use your personal data for marketing purposes – to send occasional newsletters and other occasional emails - this will be purely on an informed consent basis.

For suppliers: We process your contact information in order to manage my commercial relationship with you and to meet financial reporting obligations.

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

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and services provided;
- any statutory or legal obligations; E.g. financial or insurance retention periods
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;

- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

## 6. DATA SHARING

### **Why might you share my personal data with third parties?**

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

### **Which third-party service providers process my personal data?**

“Third parties” includes third-party service providers, professional advisory services, administration services and banking services. The following activities are carried out by third-party service providers: IT and cloud services, banking services and professional accountancy support services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

## 7. DATA SECURITY

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 8. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

### **Your rights in connection with personal data**

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis.

- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our data protection point of contact at [linda@lkavanagh.com](mailto:linda@lkavanagh.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## 9. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact at [linda@lkavanagh.com](mailto:linda@lkavanagh.com).

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 10. CONTACT US

If you have any questions regarding this notice or if you would like to speak to me about the manner in which we process your personal data, please email me at: [linda@lkavanagh.com](mailto:linda@lkavanagh.com).

If you are not satisfied with my response or believe I am processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

My data protection officer is me as a sole trader, Linda Kavanagh and you can contact me at [linda@lkavanagh.com](mailto:linda@lkavanagh.com).

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.