Privacy policy

1. Introduction

1.1 We are committed to safeguarding the privacy of [our website visitors and service users].

1.2 This policy applies where we are acting as a data controller with respect to the personal data of [our website visitors and service users]; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of [our website and services], we will ask you to consent to our use of cookies when you first visit our website.

1.4 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can [specify whether you would like to receive direct marketing communications and limit the publication of your information]. You can access the privacy controls via *[URL]*.

1.5 In this policy, "we", "us" and "our" refer to *[data controller name]*.[For more information about us, see Section 13.]

2. Credit

2.1 This document was created using a template from SEQ Legal (https://seqlegal.com).

You must retain the above credit. Use of this document without the credit is an infringement of copyright. However, you can purchase from us an equivalent document that does not include the credit.

3. How we use your personal data

3.1 In this Section 3 we have set out:

(a) the general categories of personal data that we may process;

(b) [in the case of personal data that we did not obtain directly from you, the source and specific categories of that data];

(c) the purposes for which we may process personal data; and

(d) the legal bases of the processing.

3.2 We may process [data about your use of our website and services] ("**usage data**"). The usage data may include [your IP address, 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 source of the usage data is [our analytics tracking system]. This usage data may be processed [for the purposes of analysing the use of the website and services]. The legal

basis for this processing is [consent] OR [our legitimate interests, namely [monitoring and improving our website and services]] OR [*[specify basis]*].

3.3 We may process [your account data] ("**account data**").[The account data may [include your name and email address].][The source of the account data is [you or your employer].] The account data may be processed [for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.] The legal basis for this processing is [consent] OR [our legitimate interests, namely [the proper administration of our website and business]] OR [the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract] OR [*[specify basis]*].

3.4 We may process [your information included in your personal profile on our website] ("**profile data**").[The profile data may include [your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details].] The profile data may be processed for [the purposes of enabling and monitoring your use of our website and services]. The legal basis for this processing is [consent] OR [our legitimate interests, namely [the proper administration of our website and business]] OR [the performance of a contract between you and us and/or taking steps, at you request, to enter into such a contract] OR [*[specify basis]*].

3.5 We may process [your personal data that are provided in the course of the use of our services] ("**service data**").[The service data may include *[specify data]*.][The source of the service data is [you or your employer].] The service data may be processed [for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you]. The legal basis for this processing is [consent] OR [our legitimate interests, namely [the proper administration of our website and business]] OR [the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract] OR [*[specify basis]*].

3.6 We may process [information that you post for publication on our website or through our services] ("**publication data**"). The publication data may be processed [for the purposes of enabling such publication and administering our website and services]. The legal basis for this processing is [consent] OR [our legitimate interests, namely [the proper administration of our website and business]] OR [the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract] OR [*[specify basis]*].

3.7 We may process [information contained in any enquiry you submit to us regarding goods and/or services] ("**enquiry data**"). The enquiry data may be processed [for the purposes of offering, marketing and selling relevant goods and/or services to you]. The legal basis for this processing is [consent] OR [*[specify basis]*].

3.8 We may process [information relating to our customer relationships, including customer contact information] ("**customer relationship data**").[The customer relationship data may include [your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer].][The source of the customer relationship data is [you or your employer].] The customer relationship data may be processed [for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers]. The legal basis for this processing is [consent] OR [our legitimate interests, namely [the proper management of our customer relationships]] OR [*[specify basis]*].

3.9 We may process [information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website] ("**transaction data**").[The transaction data may include [your contact details, your card details and the transaction details].] The transaction data may be processed [for the purpose of supplying the purchased goods and services and keeping proper records of those transactions]. The legal basis 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 and our legitimate interests, namely [the proper administration of our website and business]] OR [*[specify basis]*].

3.10 We may process [information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters] ("**notification data**"). The notification data may be processed [for the purposes of sending you the relevant notifications and/or newsletters]. The legal basis for this processing is [consent] OR [the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract] OR [*[specify basis]*].

3.11 We may process [information contained in or relating to any communication that you send to us] ("**correspondence data**"). The correspondence data may include [the communication content and metadata associated with the communication].[Our website will generate the metadata associated with communications made using the website contact forms.] The correspondence data may be processed [for the purposes of communicating with you and record-keeping]. The legal basis for this processing is [our legitimate interests, namely [the proper administration of our website and business and communications with users]] OR [*[specify basis]*].

3.12 We may process *[identify general category of data]*.[This data may include *[list specific items of data]*.][The source of this data is *[identify source]*.] This data may be processed for *[specify purposes]*. The legal basis for this processing is [consent] OR [our legitimate interests, namely *[specify legitimate interests]*] OR [the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract] OR [*[specify basis]*].

3.13 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].

3.14 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].

3.15 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process [any of your personal data] where such processing is necessary[for compliance with a legal obligation to which we are subject, or] in order to protect your vital interests or the vital interests of another natural person.

3.16 Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. Providing your personal data to others

4.1 We may disclose [your personal data] to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.[Information about our group of companies can be found at *[URL]*.]

4.2 We may disclose [your personal data] to [our insurers and/or professional advisers] insofar as reasonably necessary for the purposes of [obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure].

4.3 We may disclose *[specify personal data category or categories]* to [our suppliers or subcontractors][identified at *[URL]*] insofar as reasonably necessary for *[specify purposes]*.

4.4 Financial transactions relating to [our website and services] [are] OR [may be] handled by our payment services providers, *[identify PSPs]*. We will share transaction data with our payment services 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]. You can find information about the payment services providers' privacy policies and practices at *[URLs]*.

4.5 We may disclose [your enquiry data] to [one or more of those selected third party suppliers of goods and services identified on our website] for the purpose of [enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services].[Each such third party will act as

a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.]

4.6 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.[We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.]

5. International transfers of your personal data

5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to [countries outside the European Economic Area (EEA)].

5.2 We[and our other group companies] have [offices and facilities] in *[specify countries]*.[The European Commission has made an "adequacy decision" with respect to [the data protection laws of each of these countries].][Transfers to [each of these countries] will be protected by appropriate safeguards, namely [the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from *[source]*] OR [the use of binding corporate rules, a copy of which you can obtain from *[source]*] OR [*[specify appropriate safeguards and means to obtain a copy]*].]

5.3 The hosting facilities for our website are situated in *[specify countries]*.[The European Commission has made an "adequacy decision" with respect to [the data protection laws of each of these countries].][Transfers to [each of these countries] will be protected by appropriate safeguards, namely [the use of standard data protection clauses adopted or approved by the European Commission, a copy of which you can obtain from *[source]*] OR [*[specify appropriate safeguards and means to obtain a copy]*].]

5.4 *[Specify category or categories of supplier or subcontractor]* [is] OR [are] situated in *[specify countries]*.[The European Commission has made an "adequacy decision" with respect to [the data protection laws of each of these countries].][Transfers to [each of these countries] will be protected by appropriate safeguards, namely [the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from *[source]*] OR [*[specify appropriate safeguards and means to obtain a copy]*].]

5.5 You acknowledge that [personal data that you submit for publication through our website or services] may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 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.

6.3 We will retain your personal data as follows:

(a) *[personal data category or categories]* will be retained for a minimum period of *[period]* following *[date]*, and for a maximum period of *[period]* following *[date]*.

[additional list items]

6.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) the period of retention of *[personal data category]* will be determined based on *[specify criteria]*.

[additional list items]

6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7.3 We [may] OR [will] notify you of [changes] OR [significant changes] to this policy [by email or through the private messaging system on our website].

8. Your rights

8.1 In this Section 8, 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.

8.2 Your principal rights under data protection law are:

(a) the right to access;

(b) the right to rectification;

(c) the right to erasure;

(d) the right to restrict processing;

(e) the right to object to processing;

(f) the right to data portability;

(g) the right to complain to a supervisory authority; and

(h) the right to withdraw consent.

8.3 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, but additional copies may be subject to a reasonable fee.[You can access [your personal data] by visiting *[URL]* when logged into our website.]

8.4 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.

8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: [the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed]. However, there are exclusions of the right to erasure. The general exclusions include 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].

8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; 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 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: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

8.7 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: the performance of a task carried out in the public interest or in the exercise of

any official authority vested in us; or 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 we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

8.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

8.9 You 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.

8.10 To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

8.11 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.

8.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

8.13 You may exercise any of your rights in relation to your personal data [by written notice to us] OR [by *[methods]*][, in addition to the other methods specified in this Section 8].

9. About cookies

9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

10. Cookies that we use

10.1 We use cookies for the following purposes:

(a) [authentication - we use cookies [to identify you when you visit our website and as you navigate our website][(cookies used for this purpose are: *[identify cookies]*)]];

(b) [status - we use cookies [to help us to determine if you are logged into our website][(cookies used for this purpose are: *[identify cookies]*)]];

(c) [personalisation - we use cookies [to store information about your preferences and to personalise the website for you][(cookies used for this purpose are: *[identify cookies]*)]];

(d) [security - we use cookies [as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally][(cookies used for this purpose are: *[identify cookies]*)]];

(e) [advertising - we use cookies [to help us to display advertisements that will be relevant to you][(cookies used for this purpose are: *[identify cookies]*)]];

(f) [analysis - we use cookies [to help us to analyse the use and performance of our website and services][(cookies used for this purpose are: *[identify cookies]*)]]; and

(g) [cookie consent - we use cookies [to store your preferences in relation to the use of cookies more generally][(cookies used for this purpose are: *[identify cookies]*)]].

[additional list items]

11. Cookies used by our service providers

11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

11.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:

https://www.google.com/policies/privacy/.[The relevant cookies are: *[identify cookies]*.]

11.3 [We publish Google AdSense interest-based advertisements on our website. These are tailored by Google to reflect your interests. To determine your interests, Google will track your behaviour on our website and on other websites across the web using cookies.] OR [We publish Google AdSense advertisements on our website. To determine your interests, Google will track your behaviour on our website and on other websites across the web using cookies. This behaviour tracking allows Google to tailor the advertisements that you see on other websites to reflect your interests (but we do not publish interest-based advertisements on our website).] You can view, delete or add interest categories associated with your browser by visiting: https://adssettings.google.com. You can also opt out of the AdSense partner network cookie using those settings or using the Network Advertising Initiative's multi-cookie opt-out mechanism at: http://optout.networkadvertising.org. However, these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-ins available at: https://support.google.com/ads/answer/7395996.[The relevant cookies are: *[identify cookies]*.]

11.4 We use *[identify service provider]* to *[specify service]*. This service uses cookies for *[specify purpose(s)]*. You can view the privacy policy of this service provider at *[URL]*.[The relevant cookies are: *[identify cookies]*.]

12. Managing cookies

12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a) https://support.google.com/chrome/answer/95647?hl=en (Chrome);

(b) https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences (Firefox);

(c) http://www.opera.com/help/tutorials/security/cookies/ (Opera);

(d) https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies (Internet Explorer);

(e) https://support.apple.com/kb/PH21411 (Safari); and

(f) https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy (Edge).

[additional list items]

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you will not be able to use all the features on our website.

13. Our details

13.1 This website is owned and operated by *[ArteriaMediaLtd.]*.

13.2 We are registered in [England and Wales] under registration number *[*07887333*]*, and our registered office is at *[147 Gladstone St, St.Helens,Merseyside,Wa104nw, UK]*.

13.3 Our principal place of business is at *[above address]*.

13.4 You can contact us:

(a) [by post, to [the postal address given above]];

(b) [using our website contact form];

(d) [by email, using [the email address published on our website from time to time]].

14. Data protection officer

14.1 Our data protection officer's contact details are: *[Stephen Finney]*.

Free privacy policy: drafting notes

This is a standard website or web app privacy policy, which will help you to comply with data protection legislation, and has been updated for the General Data Protection Regulation (also known as the GDPR).

This policy covers the following matters (amongst others): the collection of personal information; the use of that personal information; the legal bases for the processing of that information; disclosures of that personal information to third parties; international transfers of personal information; and the use of cookies on the website.

This document might not be suitable for you if the ways in which you use personal information are complex or unusual.

In any event, there are many aspects to data protection compliance. Publishing a privacy policy or statement containing the relevant information is only one aspect - albeit an important aspect - of compliance.

Section 1: Introduction

Section 1.1

Optional element.

Section 1.2

"Personal data" is defined in Article 4(1) of the GDPR:

"(1) 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

Section 1.3

Optional element.

The inclusion of this statement in your privacy policy will not in itself satisfy the requirements of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as regards consent to the use of cookies. Guidance concerning methods of obtaining such consent is included on the Information Commissioner's website (http://www.ico.gov.uk).

Section 1.4

Optional element.

Section 1.5

Optional element.

Section 2: Credit

Section: Free documents licensing warning

Optional element. Although you need to retain the credit, you should remove the inline copyright warning from this document before use.

Section 3: How we use your personal data

Article 13(1) of the GDPR provides that:

"(1) Where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information: ... (c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing; (d) where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party".

Article 6(1)(f) of the GDPR provides that:

"(1) Processing shall be lawful only if and to the extent that at least one of the following applies: ... (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child."

Section 3.1

Article 14 of the GDPR, which applies where personal information is not obtained from the data subject, provides that information about "the categories of personal data concerned" must be supplied to data subjects.

Article 13 of the GDPR, which applies where personal information is obtained from the data subject, does not include an equivalent provision.

Nonetheless, we have included references to general categories of data in this document, because this facilitates the identification of particular purposes of processing and the legal bases of processing - information which does need to be provided under Article 13.

Section 3.2

Optional element.

Section 3.3

Optional element.

Section 3.4

Optional element.

Section 3.5

Optional element.

Section 3.6

Optional element.

Section 3.7

Optional element.

Section 3.8

Optional element.

Section 3.9

Optional element.

Section 3.10

Optional element.

Section 3.11

Optional element.

Section 3.12

Optional element. Use this form of provision to identify and provide relevant information about other categories of personal data that you may process.

Section 3.13

Optional element.

Section 3.14

Optional element.

Section 3.16

Optional element.

Section 4: Providing your personal data to others

Article 13(1)(e) of the GDPR requires that where personal data are collected from the data subject, the data controller must provide the data subject with information about "the recipients or categories of recipients of the personal data".

Equivalent rules for data collected from someone other than the data subject are in Article 14(1)(e).

Section 4.1

Optional element.

Section 4.2

Optional element.

Section 4.3

Optional element.

Section 4.4

Optional element.

Section 4.5

Optional element.

Section 5: International transfers of your personal data

Optional element.

Article 13(1)(f) of the GDPR requires that data controllers disclose to data subjects "where applicable, the fact that the controller intends to transfer personal data to a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 [transfers subject to appropriate safeguards] or 47 [binding corporate rules], or the second subparagraph of Article 49(1) [limited transfers for compelling legitimate interests], reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available".

Section 5.2

Optional element.

Section 5.3

Optional element.

Section 5.4

Optional element.

Section 5.5

Optional element. Will users have the opportunity to publish personal information on the website?

Section 6: Retaining and deleting personal data

Article 5(1)(e) of the GDPR sets out the storage limitation, one of the fundamental rules of the regime:

"Personal data shall be: ... kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with

Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ... ".

Section 7: Amendments

Optional element.

Section 7.2

Optional element.

Section 7.3

Optional element. Will you contact users to notify them of changes to the document?

- How will users be notified of changes to the document?

Section 8: Your rights

Article 13(2) of the GDPR provides that, where personal data is collected from a data subject, certain information about data subject rights must be provided:

"In addition to the information referred to in paragraph 1, the controller shall, at the time when personal data are obtained, provide the data subject with the following further information necessary to ensure fair and transparent processing: ... (b) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability; (c) where the processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal; ...".

Similar provisions are set out in Article 14 in relation to personal data which is not collected from the relevant data subject.

Section 8.3

The right to access is set out in Article 15 of the GDPR.

Section 8.4

The right to rectification is set out in Article 16 of the GDPR.

Section 8.5

The right to erasure (or right to be forgotten) is set out in Article 17 of the GDPR, and must be notified to data subjects under Articles 13(2)(b), 14(2)(c) and 15(1)(e) of the GDPR.

Consider modifying the highlighted circumstances and exclusions, depending upon what will be most relevant to your processing.

Section 8.6

Article 18(1) of the GDPR states:

"The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies: (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; (d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

Section 8.7

The right to object to processing is detailed in Article 21 of the GDPR, and must be notified to data subjects under Articles 21(4), 13(2)(b) and 14(2)(c).

Section 8.8

Optional element.

Article 21(3) of the GDPR states:

"Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes."

Section 8.9

Optional element.

This right is set out in Article 21(6) of the GDPR.

Section 8.10

The right to data portability is set out in full in Article 20 of the GDPR, and must be notified to data subjects under Articles 13(2)(b) and 14(2)(c).

Section 8.11

The right to lodge a complaint with a supervisory authority is set out in Article 77 of the GDPR, and must be notified to data subjects under Articles 13(2)(d), 14(2)(e) and 15(1)(f).

Section 8.12

Article 7(3) of the GDPR sets out the right of withdrawal. The right must be notified to data subjects under Articles 13(2)(c) and 14(2)(d). See also Article 17(1)(b).

Section 9: About cookies

Optional element.

Section 9.2

Optional element.

Section 9.3

Optional element.

Section 10: Cookies that we use

Optional element.

Section 11: Cookies used by our service providers

Does the website serve any third party cookies, analytics cookies or tracking cookies to users?

Section 11.2

Optional element.

Section 11.3

Optional element. Will Google AdSense advertisements be published on the website?

This provision should be included if you publish Google AdSense interest-based advertisements on your website. Additional disclosures will be required if you have not opted out of third-party ad serving.

If the website sets any other cookies to users' machines that track behaviour, information about those cookies will also need to be disclosed.

Section 12: Managing cookies

Optional element.

Section 12.3

Optional element. Will the blocking of cookies have a negative effect upon the use of the website from a user perspective?

Section 13: Our details

UK companies must provide their corporate names, their registration numbers, their place of registration and their registered office address on their websites (although not necessarily in this document).

Sole traders and partnerships that carry on a business in the UK under a "business name" (i.e. a name which is not the name of the trader/names of the partners or certain other specified classes of name) must also make certain website disclosures: (i) in the case of a sole trader, the individual's name; (ii) in the case of a partnership, the name of each member of the partnership; and (iii) in either case, in relation to each person named, an address in the UK at which service of any document relating in any way to the business will be effective. All websites covered by the Electronic Commerce (EC Directive) Regulations 2002 must provide a geographic address (not a PO Box number) and an email address. All website

operators covered by the Provision of Services Regulations 2009 must also provide a telephone number.

Section 13.1

- What is the name of the company, partnership, individual or other legal person or entity that owns and operates the website?

Section 13.2

Optional element. Is the relevant person a company?

- In what jurisdiction is the company registered?
- What is the company's registration number or equivalent?
- Where is the company's registered address?

Section 13.3

Optional element.

- Where is the relevant person's head office or principal place of business?

Section 13.4

Optional element.

- By what means may the relevant person be contacted?
- Where is the relevant person's postal address published?
- Either specify a telephone number or give details of where the relevant number may be found.
- Either specify an email address or give details of where the relevant email address may be found.

Section 14: Data protection officer

Optional element.

Section 14.1

Some data controllers and data processors will have an obligation to appoint a data protection officer (DPO). The basic obligation is set out in Article 37(1) of the GDPR:

"(1) The controller and the processor shall designate a data protection officer in any case where: (a) the processing is carried out by a public authority or body, except for courts acting in their judicial capacity; (b) the core activities of the controller or the processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale; or (c) the core activities of the controller or the processor consist of processing on a large scale of special categories of data pursuant to

Article 9 and personal data relating to criminal convictions and offences referred to in Article 10."

Article 13(1)(b) of the GDPR provides that:

"(1) Where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information ... (b) the contact details of the data protection officer, where applicable".

See also Article 14(1)(b).

- Insert contact details of the appointed data protection officer (if any).