

## **HATS Gloucester Ltd**

### **WEBSITE PRIVACY POLICY**

**This policy governs the use of personal data which you provide to us via our website. Personal data is any or all data relating to a natural person who is identified, or can be identified, from the data.**

HATS Gloucester Ltd (“we”, “our”, “us”) respects your privacy. We understand that how your personal data is used and shared online matters to you, and we take the privacy of those who visit our website (“the site”) very seriously. We will not collect any data other than when you contact us, and we will always process that data in compliance with the law.

Our site may contain links to other sites, please be aware that if you choose to click on those links, your data may be processed by other organisations hosting those sites. We cannot control or monitor this, and you should have regard to their privacy policies.

Please read this privacy policy carefully and ensure you understand it. When you first use our site, this is taken to be agreement to this policy. If you do not accept the policy, then you should stop using the site immediately.

#### **Who we are**

- The site is owned and operated by HATS Gloucester Ltd.
- We are regulated by and are a member of the Association of Chartered Certified Accountants (ACCA).

#### **Your rights**

You have certain rights as a data subject under the General Data Protection Regulation (GDPR), which governs the collection, processing and disposal of personal data by organisations such as ours.

In relation to personal data about you, you have the right:

- to be informed about how and why we collect and use the data
- to be informed about who may receive your data, where it may be transferred and how long it will normally be retained
- to be given access to the data we hold
- to have any inaccurate or incomplete data rectified
- to ask us to delete personal data earlier than we might already dispose of it
- to prevent us from processing the data further
- to object to us using the data for particular purposes, for example the use of your personal data for direct marketing purposes.

While we will restrict the processing of your personal data in line with your request, we may add your personal data (name and address) to a ‘suppression list’ to ensure we do not send any communications in the future.

We provide contact details at the end of this policy for you to use if you have any complaint about our processing of your personal data. If you are not satisfied with the way we deal with this issue, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO), which is the body in charge of supervising personal data use in the UK.

**What data do we collect?**

If you communicate with us by email via our website, we will collect your name, email address and any other content that you send to us in the body of the mail. We do not collect any other personal data by any other method and, in particular, we do not place cookies on our site to collect personal data.

**Cookies**

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 stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We use "session" cookies on the website. Session cookies will be deleted from your computer when you close your browser.

We will use the session cookies to: keep track of you whilst you navigate the website; prevent fraud and increase website security.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at:

<https://www.google.com/privacypolicy.html>.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third-party cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites.

**How is your data used?**

We will process and store your data securely, and we will only keep it for as long as we need it for the purpose(s) for which it was collected.

In relation to the data we do collect, as laid out in the section above, we may use it as follows:

- answering any enquiry you raise;
- delivering and supporting the services you request;
- administering your customer account, and to support other general business activities;
- administering and enhancing the website;
- improving your browsing experience by personalising the website;
- satisfying legal or regulatory requirements;
- as otherwise described in this policy.

The duration for which we retain the personal data will differ depending on the type of data and the reason why it was submitted. However, in some cases personal data may be retained on a long-term basis: for example, if you use our services basic personal data about you will normally be retained for so long as you receive those services from us, and personal data that we need to retain for legal purposes will normally be retained

for at least seven years in accordance with usual commercial practice and regulatory requirements.

You have the right to withdraw your consent to our use of your personal data at any time, and to request that we delete it.

We will not share your personal data with anyone at any time, other than as detailed in the disclosures below.

### **Disclosures**

We may disclose information about you to other organisations who provide specific business services to us.

Such organisations are required to handle your personal data in accordance with applicable laws related to privacy and data protection.

Service providers – organisations who require your personal data in order to deliver the services which you have requested from us.

Payment Gateways – used to facilitate the payment for services. The organisation will only have access to the personal data you provide directly to them when you make a credit card payment. We will not collect or store credit card details.

General Service providers – who provide specific, ad-hoc services to us. For example, courier services.

Cloud Service Providers - who host bespoke business applications that allow us to improve the efficiency and effectiveness of our general business activities.

Auditors - used to validate our compliance with the Vendor's contractual Terms and Conditions. For example, personal data (email address) may be used to confirm our licence management procedures are correct.

Other persons or organisations permitted or required by applicable law or regulation.

Except as provided in this privacy policy, we will not disclose personal data to any other category of organisation.

### **Children**

We will never knowingly collect personal information from minors (children under 16 years of age, or any other age defined under applicable law). If we become aware that a minor is attempting to or has submitted personal information, we will notify them that we will not accept his or her personal information. We will then remove any such personal information from our records.

### **How and where do we store your data?**

We will only keep your data as long as we need it for the purpose(s) for which it is collected, and/or for as long as we have your permission to hold it.

Your data will only be stored in the UK.

The steps we take to secure your data include

- IT security measures – Firewalls, anti-virus software, encryption software etc.
- Staff training

**Accessing your data**

You are entitled to make a subject access request (SAR) under the GDPR. This means that you may request a copy of any personal data we hold about you. We will provide any or all information in response to your request.

**Data Protection Manager & Contact details**

Our Data Protection Manager responsible for the information collected on the site is Julian Watkins.

If you have any questions about the site or this policy, or you wish to make a SAR, then please contact Julian, in writing making your request or query clear:

- email: [accounts@hatsgloucester.co.uk](mailto:accounts@hatsgloucester.co.uk)
- postal address: HATS Gloucester Ltd, 48 Hucclecote Road, Gloucester, GL3 3RS.

**Amending the policy**

We may change this policy from time to time, in response to changes in the law or for operational reasons. Any changes will immediately be posted on the site and you will be deemed to have accepted the amended policy if you continue to use the site afterwards. You should therefore regularly review this policy.