



Sam Hollis Web Design

Making the web work for you

## Privacy Statement

**Sam Hollis Web Design, Company number 10565471**

This Privacy Statement explains what personal data and other information is collected by us, **Sam Hollis Web Design** (“we”, “our”, “us”), as part of our activities, and how we use or process that information.

We are committed to complying with the Data Protection Act 2018 (DPA) and the EU General Data Protection Regulation (GDPR). These are referred to in this Privacy Statement as the “**data protection legislation**”.

The data protection legislation give you various rights regarding the way in which we store and use your information. These are set out below in section 1.1 - Your rights under the data protection legislation.

For the purpose of the data protection legislation, the data controller is:

**Sam Hollis Web Design**, 8 Birch Grove, Lostock Green, Northwich, Cheshire CW9 7SS

ICO Registration Number: ZA494383

If you have any questions about this Privacy Statement, our practices, or your dealings with Sam Hollis Web Design, you can contact us at the above address, email us on [sam@samhollis.co.uk](mailto:sam@samhollis.co.uk) or telephone **01482 426427**

This Statement may change at any time so please review it from time to time.

Sam Hollis Web Design, July 2020

To make it easier for you to review those parts of the Privacy Statement which apply to you, we have divided up the document into sections.

[Section 1: General](#)

[Section 2: Website](#)

[Section 3: For our customers](#)

[Section 4: For our employees, Board members and other associates](#)

### Section 1: General

Laws apply to our use of anyone’s personal information and everyone has rights regarding how their personal information is handled. We have published this Statement to tell you:

- What information we may collect about you
- How we store your personal information
- What we use your personal information for
- Who (if anyone) we may pass it on to and how they use it, and
- Your rights as an individual



In this Privacy Statement, when we use the following words or abbreviations they will have the following meanings:

| <b>Word or abbreviation</b>                                | <b>Meaning</b>   |
|--|--|
| Associate  | Company, organisation or individual who carries out work for or on behalf of Sam Hollis Web Design   |
| Board member or members                                    | Member/s of the Board of Directors   |
| Customer   | An individual or company who buys goods or services from us  |
| Employee or employees                                      | Any or all people employed whether full time or part time, permanent, temporary or fixed term contract.  |
| Personal data or personal information                      | Information from which the identity of a living individual may be determined. Examples of Personal Data include (but are not limited to) first and last name, physical address, email address, phone number, work history and other contact information.   |
| Sensitive or special category personal data or information | This is defined as personal data consisting of information about one or more of: <ul style="list-style-type: none"><li>• Racial or ethnic origin</li><li>• Political opinion</li><li>• Religious or philosophical beliefs</li><li>• Trade union membership</li><li>• Genetic or biometric data</li><li>• Physical or mental health or condition</li><li>• Sex life or sexual orientation</li><li>• Criminal convictions and offences as well as alleged offences</li></ul> |
| Visitor  | An individual visiting our website or our premises   |

## 1.1 Your rights under data protection legislation

We will ensure that the rights of people about whom information is held can be fully exercised under data protection legislation. These rights are:

- The right to information – under this right we must provide information to you and demonstrate that we collect and process your personal data fairly. We do this through this Privacy Statement.
- Right to access – you have the right to obtain confirmation that your data is being processed; access to your personal data; and other supplementary information
- The right to rectification – you have the right to have information about you corrected and / or to challenge us about the accuracy of the information we hold
- Right to erasure - the right to erasure (also known as the right to be forgotten) states that the you can have personal data erased under a number of specific circumstances
- Right to restrict processing – you are allowed, under certain specific circumstances, to prevent us from conducting specific processing of your data
- Right to data portability – you can request a copy of the information you have provided to us in a useful electronic format that another organisation could use



- Right to object – you can object to us processing your data if we cannot demonstrate legitimate grounds for that processing
- Right to appropriate decision making – you have the right not to be subject to a decision based solely on automated processing
- Right to notification; it is our duty to notify any third parties that may process our data if the you exercise your rights to rectify, restrict or erase your data

Should you wish to exercise any of your rights, please contact us using the details above.

## **1.2 Retention of information**

We retain your information only as long as we need it. If you have a specific query regarding how long we retain your information please contact us using the details above.

## **1.3 Legal Basis**

The legal bases we rely on for using personal information are as follows:

- Processing is necessary for the performance of a contract;
- Processing is necessary for the compliance with a legal obligation;
- Processing is necessary for our legitimate interests; or
- Consent has been obtained

We apply the most appropriate legal basis to personal data processing relative to the situation.

## **1.4 Consent**

Where we have requested your specific consent for processing your information (for marketing for example), you have the right to withdraw that consent at any time by contacting us using the details above. You may also unsubscribe from marketing emails by clicking the 'unfollow' link at the bottom of the email.

## **1.5 Complaints**

If you are dissatisfied with the way we have handled your personal data you should contact us ([click here](#)) so that we can investigate in the first instance. Following our response to you, if you are still dissatisfied then you have the right to complain to the Information commissioner's Office (ICO).

## **Section 2: Website**

### **2.1 Cookies**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit

[www.allaboutcookies.org](http://www.allaboutcookies.org)

which contains comprehensive information on cookies on a wide variety of browsers. You will also find details on how to delete cookies from your computer.

Our website will ask for your cookie preference on your first visit. You may choose to opt out of non-essential cookies. However, this may affect your browsing experience.

To check if cookies are enabled on your device, please follow the steps below. To understand these settings, the following links may be helpful, or you can use the Help option in your browser for more details.



[Cookie settings in Internet Explorer](#)

[Cookie settings in Firefox](#)

[Cookie settings in Chrome](#)

[Cookie settings in Safari web and iOS.](#)

To learn about controlling cookies on the browser of your mobile device please refer to your handset manual.

## 2.2 Other websites

Our website contains links to other websites. This privacy policy only applies to this website (Sam Hollis Web Design); we cannot be responsible for the protection and privacy of any information which you provide whilst visiting other sites. When you link to other websites you should read their own privacy policies.

## 2.3 Cookies used on this website

| Cookie name   | What it does   | When it expires       |
|---------------|--|-----------------------|
| _hssrc        | <i>This gathers information about visitor numbers and other Analytics information for Hubspot CRM</i>      | <i>End of session</i> |
| catAccCookies | <i>Remembers whether you have accepted cookies on this website</i>   | <i>1 month</i>        |
| _hstc         | <i>This gathers information about visitor numbers and other Analytics information for Hubspot CRM</i>      | <i>1 year</i>         |
| _gid          | <i>This gathers information about visitor numbers and other Analytics information for Google Analytics</i> | <i>1 month</i>        |
| hubspotutk    | <i>This authenticates this site with the Hubspot platform</i>  | <i>1 year</i>         |
| _hssc         | <i>This gathers information about visitor numbers and other Analytics information for Hubspot CRM</i>      | <i>1 month</i>        |
| _ga           | <i>This identifies individual visitors for Google Analytics</i>  | <i>2 years</i>        |

## Section 3: For our customers

### 3.1 Information we may collect from you

We may collect the following personal information about you:

- Details of transactions you carry out through us and of the fulfilment of our services to you



- Your name and contact details for marketing with your permission
- Your name and contact details for public health reasons (e.g. pandemic)
- Information contained in emails or other correspondence from you and records of telephone calls or meetings with you

*To enhance your experience with us*

- Your name and contact details for customer satisfaction surveys, newsletters and service information
- With your consent, your name, photo, video or story for marketing materials, advertising or press releases or use by the media
- Any information about complaints about our service or other individuals, or accidents or incidents
- Your comments about services from us or our suppliers

### **3.2 Where we store your personal information**

We are committed to holding your personal information securely. This means only those of our colleagues and contractors that need to see it have access.

If we can store your personal information digitally we will, however there will be cases where we have paper copies instead, or as well.

Occasionally our processors or sub-processors may process information outside the European Economic Area (EEA). Where this happens we will ensure that the processor is compliant with the data protection legislation including transfer agreements that incorporate approved model clauses.

### **3.3 What we use your personal information for**

- As above, and generally for providing our services for you
- To issue bills and arrange payment with you
- To carry out our obligations arising from any contracts entered into between you and us
- To conduct appropriate anti-fraud or credit reference checks
- Keeping in touch with our customers, understanding your needs and preferences, and inviting you to events
- Telling you about changes to Sam Hollis Web Design and its services
- Prevention, detection and prosecution of crime
- Quality management
- Informing our staff, contractors or others (as appropriate) about past incidents (for example, anti-social behaviour), for their protection, in line with our policies
- Other purposes. We may anonymise your information so that it cannot be linked to you. In that case we may use the data for any purpose

### **3.4 Who else we may pass on your information to**

Normally, only we will be able to access your personal information. However there may be times when we disclose your details to others, as follows:

- Our suppliers who enable us to provide our services to you, or who provide services on our behalf:
  - IT providers who own or manage the computers, phones or systems we use
  - Subcontractors who carry out work on our behalf
  - Banks. For example to carry out payments through a secure system
  - Companies that assist us in printing and mailing out our letters, leaflets and newsletters
  - Our professional advisors and providers of financial services
- Others who may request information from us for their own purposes:
  - For crime prevention or detection, risk assessment, resolution of complaints or other issues



- The police, fire service, health authorities or medical practitioners

We do not sell your information to others for their marketing or commercial purposes.

We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them or they act in some recognised official capacity.

### **3.5 Social media**

We may get your information from social media, whether on our own accounts or elsewhere. Where you use our own website or social media you grant us an irrevocable, royalty-free, non-exclusive licence, and give us your consent, to copy, use and reproduce any of your contributions for any purpose.

Where you make a contribution to any social media (whether on our own accounts or elsewhere) we may use that information for any of the purposes stated in this Privacy Statement.

Where a contribution to any social media (whether on our own accounts or elsewhere) constitutes a breach of Sam Hollis Web Design terms and conditions, agreements, or laws that apply, we may take the following actions:

- Start legal proceedings against you for reimbursement of all costs on an indemnity basis (including, but not limited to, reasonable administrative and legal costs) resulting from the breach.
- Report you and disclose such information to law enforcement authorities in any jurisdiction as we reasonably feel is necessary.

The responses described in this Privacy Statement are not limited, and we may take any other action we reasonably deem appropriate and we are not obliged to take any action.

### **3.6 Marketing**

We would like to send you information about products and services of ours which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please [click here](#).

## **Section 4: For our employees, Board members and other associates**

### **4.1 Information we may collect from you**

We may collect the following personal information about you:

*When you first come into contact with us*

- Your name and contact details for use by us and by our partners
- Sensitive personal information such as age, sex, date of birth, ethnicity, particular needs or preferences so that we can meet your needs and those of employment legislation

*For employment and/or board membership purposes*

- Attendance, equality and diversity, disciplinary, pension, benefits, references, employee services, training, welfare and sickness absence and any other information necessary to fulfil obligations of both employer and employee (or board/committee/panel member) as given by law and/or contract of employment and/or contract of engagement
- Next of kin information so that we have contact details in case of emergency
- Bank details to make salary and any other payments to you
- National Insurance (NI) details to fulfil obligations relating to tax and NI payments and deductions
- Information that you provide through the application process



- Photographs, voice and/or video recordings, written stories etc. to be used for example in ID cards, for company promotion and publicity, and for safety, crime reduction and quality management

*For associates*

- Attendance, equality and diversity, disciplinary, pension, benefits, references, employee services, training, welfare and sickness absence and any other information necessary to fulfil obligations of both employer and employee, associate or board member as given by law and/or contract of employment and/or contract of engagement

*In addition*

- We may hold information about your history such as credit or offences, if we need it to look after our colleagues, organisation or anyone else

We may obtain the information, or related information, from you or our partner organisations (see below), our colleagues or public information sources including credit reference agencies.

We may also record factual information from time to time, and any action we take, so we have a record of what happened.

#### **4.2 Where we store your personal information**

We are committed to holding your personal information securely. This means only those of our colleagues and partners that need to see it have access. If we can store your personal information digitally we will, however there will be cases where we have paper copies instead, or as well.

Occasionally our processors or sub-processors may process information outside the European Economic Area (EEA). Where this happens we will ensure that the processor is compliant with the data protection legislation including transfer agreements that incorporate approved model clauses.

#### **4.3 What we use your personal information for**

- As above, and generally for providing our services for you
- Keeping in touch with you, understanding your needs and preferences, inviting you to events and offering and booking appointments with you
- Telling you about changes to Sam Hollis Web Design and its services
- Meeting your employment needs and requirements
- Managing payments to you and for accounting purposes
- Providing additional services, where available, at your request including skills training, adaptations and every day support services
- Prevention, detection and prosecution of crime
- Quality management
- Meeting our legal obligations including those of Her Majesty's Revenue and Customs (HMRC) and other regulators
- Other purposes – we may anonymise your information so that it cannot be linked to you. In this case we may use the data for any purpose

#### **4.4 Who else we may pass on your information to**

Normally only we will be able to access your personal information, however there may be times when we disclose your details to others, as follows:

- Our suppliers who enable us to provide our services to you, or who provide services on our behalf:
  - Banks, for example to carry out payments through a secure system
  - Companies that assist us in mailing out our letters, leaflets and newsletters
  - Health service providers
  - IT providers who own or manage the computers, phones or systems we use



- Our professional advisors and providers of financial services
- Payroll service providers
- Pension service providers
- Our partner organisations whose purposes dovetail with ours:
  - Training providers or learning institutions
  - The police, fire services, health authorities or medical staff who provide services
- Others who may request information from us for their own purposes:
  - Utility companies
  - Debt collection agencies acting for others
  - For crime prevention or detection, risk assessment, resolution of complaints or other issues
  - Local authorities, government departments and other public authorities, such as for preventing fraud

We may sometimes be obliged to disclose your personal data by law or by court order.

We do not sell your information to others for marketing or commercial purposes.

We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them or they act in some recognised official capacity. There may be a delay with us dealing with such requests whilst we confirm identity or check that we have your approval to deal with them.

#### **4.5 Social media**

We may obtain your information from social media, whether on our own accounts or elsewhere. Where you use our own website or social media you grant us an irrevocable, royalty-free, non-exclusive licence, and give us your consent, to copy, use and reproduce any of your contributions for any purpose.

Where you make a contribution to any social media (whether on our own accounts or elsewhere) that relates in any way to Sam Hollis Web Design, or to your past or current employment with us, we may use that information for any of the purposes stated in this Privacy Statement.

Where a contribution to any social media (whether on our own accounts or elsewhere) constitutes a breach of our Code of Conduct, policy, contract, terms and conditions or laws that apply, we may take the following actions:

- Issue you with a warning
- Start legal proceedings against you for reimbursement of all costs on an indemnity basis (including, but not limited to, reasonable administrative and legal costs) resulting from the breach
- Take further legal action against you (including, but not limited to, proceedings for a breach of your contract of employment or other contract you may have with us)
- Report you and disclose such information to law enforcement authorities in any jurisdiction as we reasonably feel is necessary
- Report you and disclose such information to any local government or statutory body in the United Kingdom as we reasonably feel is necessary
- Report you and disclose such information as we reasonably feel is necessary to the site administrator and/or take action against you through the site administrator's procedures to enforce the policies and terms and conditions that apply between you and the site administrator and/or between you and us

The responses described in this Privacy Statement are not limited, and we may take any other action we reasonably deem appropriate and we are not obliged to take any action.