

It's Written In Stone

1 Church Walk, Stanton St Bernard, Wiltshire, SN8 4LL

itswritteninstone@gmail.com 0797 976 1439

PRIVACY POLICY

We are committed to protecting the privacy and security of personal data. This policy tells you how we will collect and use your personal data, and what you should expect in respect of the personal information about you that we have collected.

We are **It's Written In Stone**. 1 Church Walk, Stanton St Bernard, Wiltshire, SN8 4LL
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We are the data controller of the personal data that we keep and use, and we are therefore responsible for making sure that our systems, processes and people comply with the relevant data protection laws in respect of that personal data.

We will act in respect of personal data to comply with the six principles of the GDPR, which are:

- Lawfulness, fairness and transparency;
- Purpose limitation;
- Data minimisation;
- Accuracy;
- Storage limitation;
- Integrity and confidentiality.

You have rights in respect of how your personal data can be processed; these include the right to:

- request of a copy of your personal data;
- request that inaccurate data is rectified; and
- request that your personal data is in certain circumstances erased or restricted.

You have the right to complain to the Information Commissioner, which you can do by contacting the Information Commissioner's Office (ICO) directly. Full contact details, including a helpline number, can be found on the ICO website (www.ico.org.uk). This website has useful information on your rights and our obligations.

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

We collect and process data for the following reasons:

1. personal data collected and created in relation to our providing services; and
2. personal data relating to people who have asked to receive our newsletters and other information services or marketing materials; and
3. personal data relating to our people (which means those people working for our firm, or providing services to us, or potentially working or providing services to us, including employees, consultants, temporary or casual workers and contractors).

All of our people are required to abide by our Privacy Policy when handling personal data, and will be provided with appropriate data protection training. Any breach of data protection will be taken seriously, and may result in disciplinary action. Our Data Protection Manager will provide the advice and guidance to our people on data protection issues, as is required.

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1. **Providing services**

COLLECTION:

We will collect names, business information and required identification documentation for our clients. This will be done for the management of the commercial relationship with our clients. Additionally, we may collect and use additional personal data when a person is identified in matters on which we are working.

We may collect this personal data from you directly, and also from publicly available third party sources. Additional personal data will be collected as it is created by or supplied to us in the conduct of any matter that we are instructed on.

USE:

We will use the personal data for the necessary administration of the relationship with our client, and to comply with requirements that we are required or recommended to undertake, whether by statute or otherwise.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- In performance of a contract (the agreement to provide products or services); and/or
- compliance with a legal obligation; and/or
- vital interests of the data subject; and/or
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal data in the following situations, which are likely to be less common:

- where we need to protect your interests (or someone else's interests);
- where it is needed in the public interest or for official purposes.

DISCLOSURE:

We may share personal data with third party providers who deliver services to support the operation of our firm, and with others that we refer clients to for specialist services. We may also need to share your personal data with a regulator or otherwise to comply with the law.

In respect of all disclosures of personal data, we will only share the personal information which is necessary for the particular purpose for which it is provided, or where we have another legitimate interest in doing so, and we will ensure that the personal data is appropriately protected.

RETENTION PERIOD:

We will keep personal data only for as long as is necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements. Normally, our retention period for personal data collected for

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this purpose is a minimum of 6 years after the end of the period that we are providing services.

2. **Our newsletters, other information services & marketing materials (“our Information”)**

COLLECTION:

We will collect information such as name, email address, IP address (or similar unique identifiers) job title together with the additional information that you provide to us, for example when you let us know those areas of our practice that you are interested in receiving information about. In respect of events that we offer, this information may include details of any access or dietary requirements that you have, which may reveal information about the health or religious beliefs of a data subject.

We will collect personal data in our practice management system when you tell us that you wish to receive updates, or otherwise give us your personal details. You may at any time tell us that you wish to stop receiving our Information.

USE:

Personal data will be used to provide you with our Information that you ask for, or that we think are relevant to the preferences that you may have given to us. We may analyse what areas of information are of interest to you so that we can better target the Information that we provide.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- With your consent; and/or
- In performance of a contract (the agreement to provide products or services); and/or
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

DISCLOSURE:

We do not currently use any third party in respect of the provision of our Information. In respect of all disclosures of personal data, we will only share the personal information which is necessary for the particular purpose for which it is provided, or where we have another legitimate interest in doing so, and we will ensure that the personal data is appropriately protected.

RETENTION PERIOD:

We will keep personal data only for as long as is necessary to fulfil the purposes for which we collected it. Any personal data that we have from you solely for the purposes of your receiving our Information will not be used once you have asked us to stop providing these to you (except to the extent that it is necessary to stop you receiving the Information).

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3. **Changes to your personal data**

It is very important that the personal information that we hold about you is accurate and current. Please tell us if your personal information changes during your relationship with us.

4. **Data Security**

We have put in place measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those of our people and other third parties who have a business need to know. They will only process your personal data on our instructions and where they have agreed to treat the information confidentially and to keep it secure. We have put in place procedures to deal with any suspected data security breach and will notify you and the ICO of a suspected breach where we are legally required to do so.

5. **Where we store your personal data**

We will not transfer personal data outside of the EEA unless personal data is adequately protected, as required by the GDPR.

6. **Your rights**

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

- Request **access** to your personal data. This enables you to ask to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it.
- Request **correction** of the personal data that we hold about you.
- Request **erasure** of your personal data.
- **Object to processing** of your personal data where we are relying on our legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the **restriction** of processing of your personal data.
- Request the **transfer** of your personal data to another party.

7. **Links from our website**

Our website may, from time to time, contain links to and from the websites of third parties that we permit to make such links. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. We recommend that you check these policies before you submit any personal data to these websites.

CHANGES TO THIS PRIVACY POLICY

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Any changes we may make to our privacy policy in the future will be posted on our website, so please ensure that you are viewing the correct version.

Please contact us if you have any questions, comments or requests regarding this Privacy Policy.