# Generated privacy notice - professional services

You can download a Word or ODT version of this generated privacy notice by clicking "Download options" at the top of the page. Alternatively, you can copy and paste it. Both options will allow you to add your own branding or extra text to your new privacy notice, or personalise it by adding your own branding or logo. Remember - you **must** make sure the content is accurate and complete and easily accessible.

Please make sure you delete the green, orange and red instruction boxes before you publish your privacy notice.

Reflective Rebels customer privacy notice

Registered name: Adnovar Ltd

We are the controller of your personal data. For more information on controllers and their responsibilities please see <u>Key data protection terms</u> you need to know.

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

## Contact details

#### Email

ben@reflectiverebels.co.uk

## What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Information relating to compliments or complaints
- Records of meetings and decisions
- Website user information

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences
- Technical data, including information about browser and operating systems

We collect or use the following personal information for **information updates or marketing purposes**:

- · Names and contact details
- Addresses
- Profile information
- Marketing preferences
- Purchase or account history
- Website and app user journey information
- IP addresses

We collect or use the following personal information to **protect client** welfare:

- Names and contact information
- Emergency contact details

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses
- Account information
- Purchase or service history

# Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible <u>lawful</u> <u>bases</u> in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data

protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. <u>Read more about the right to rectification</u>.
- **Your right to erasure** You have the right to ask us to delete your personal information. Read more about the right to erasure.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- Your right to object to processing You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide** and improve products and services for clients are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - o In order to promote and provide services to your organisation.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

 Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - o To promote and provide services to your organisation.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to **protect client welfare** are:

 Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information for **dealing** with queries, complaints or claims are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

## Where we get personal information from

- Directly from you
- Publicly available sources
- Providers of marketing lists and other personal information

• Suppliers and service providers

## How long we keep information

[Paste your retention schedule here.]

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

[You said you had a retention schedule, but it wasn't available online. You can paste it above - you must not publish the privacy notice without information about how long you store personal information.]

#### Who we share information with

Data processors

#### **Wix Ltd**

This data processor does the following activities for us: Porvides website and booking systems

Others we share personal information with

- Professional or legal advisors
- Emergency services
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media
- Professional consultants

## Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Wix Ltd

**Category of recipient:** Website host

**Country the personal information is sent to:** United States of America, Ireland, South Korea, Taiwan and Israel.

**How the transfer complies with UK data protection law:** The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

Where necessary, our data processors will share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Wix Ltd

Category of recipient: Website provider

**Country the personal information is sent to:** United States of America, Ireland, South Korea, Taiwan and Israel.

### How the transfer complies with UK data protection law:

https:\/\www.wix.com\/about\/privacy

## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

#### The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <a href="https://www.ico.org.uk/make-a-complaint">https://www.ico.org.uk/make-a-complaint</a>

# Last updated