

Privacy Notice

BACKGROUND

Schafer Partnership Ltd understands that your privacy is important to you and that your personal information (personal data) is used fairly and responsibly. We respect and value the privacy of all of our clients and customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

We have implemented systems and controls to ensure your rights and freedoms are protected and undertake to meet our obligations under Data Protection Legislation, i.e. the Data Protection Act 2018 (DPA 2018), the UK General Data Protection Regulation (UK GDPR), and the Privacy and Electronic Communications Regulations (PERC).

1. Information About Us

Schafer Partnership Ltd. is a limited company registered in England & Wales Company No. 08969942.

Registered address: Holly House, Ingram Road, Melksham, Wiltshire, SN12 7JH

Email address: office@schaferpartnership.co.uk.

Telephone number: 01225 240158.

ICO Registration No.: ZA202168

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under Data Protection Legislation, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- The right to lodge a complaint with the regulator. Please see Part 12 below.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

Depending upon your use of our websites & services, we may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data and/or personal data relating to children, data relating to criminal convictions and/or offences.

Data Collected

Identity Information e.g. name.

Contact information e.g. address, email address, telephone numbers.

Business information e.g. business name, job title, profession, business address & contact telephone number and email address.

Different variations of personal data may be required for each service so we may not collect all of the data listed above for all services.

How We Collect the Data

Website forms, email correspondence, postal correspondence, online information (e.g. websites & directories), verbally.

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business. Supplying our services to you. Managing payments for our services.	Your name, business name & contact information.	Necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract (including verbal contracts).
Personalising and tailoring our services for you.		Legitimate interests pursued by us including running our business and providing our services.
Communicating with you, including supplying you with information by email and/or by post.		For compliance with a legal obligation to which we are subject.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data

Identity Information including name & title.
Contact information including address, email address, telephone numbers.
Business information including business name, job title, profession, business address & contact telephone number and email address.

How Long We Keep It

We will not keep your information for any longer than is necessary, but for at least as long as is necessary to fulfil our commercial and legal obligations, and for at least 7 years after your use of our services ends in order to comply with those obligations.

8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the UK or European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- appropriate security measures in place to prevent unauthorised access, alteration, disclosure, loss, damage or destruction of your information.
- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

When we use a third party data processor contracted to perform direct marketing functions, the data they process is restricted to limited contact details (name & email address) only. Some companies, like Mailchimp, may transfer and process data outside of the EU. In such cases they have agreed to provide an adequate level of protection for any data processed, in line & accordance with the requirements of EU Data Protection Regulations.

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies when we contract with these third parties to supply services to us, e.g. marketing.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

We prefer all subject access requests be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use on our website. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. However, if your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Postal Address:

Data Controller,
Schafer Partnership Ltd,
Holly House,
Ingram Road,
Melksham,
SN12 7JH

Email address: office@schaferpartnership.co.uk.

Website address: <http://www.schaferpartnership.co.uk/subject-access.php>

12. How Do You Make A Complaint To The Regulator?

By writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

By telephoning: 0303 123 1113

By emailing: casework@ico.org.uk

By using their website: <https://ico.org.uk/make-a-complaint/your-personal-information-concerns>

13. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be included in an updated Privacy Notice available on our website.