

Privacy policy for Pete Sharma Associates Ltd

1. Introduction

- 1.1 We are committed to safeguarding the privacy of the visitors to our web site and those using our services.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our web site visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our web site. Where those cookies are not strictly necessary for the provision of our web site, we will ask you to consent to our use of cookies when you first visit our web site.
- 1.4 In this policy, "we", "us" and "our" refer to Pete Sharma Associates Ltd. For more information about us, see Section 13.

2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com/free-legal-documents/privacy-policy>).

3. How we use your personal data

- 3.1 In this Section 3 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (c) the legal bases of the processing.
- 3.2 We may process data about your use of our web site and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and web site navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system, Google Analytics. This usage data may be processed for the purposes of analysing the use of the web site and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our web site and services.
- 3.3 We may process your web site user account data ("**account data**"). The account data may include your name and email address. The source of the account data is you, your agent or your employer. The account data may be processed for the purposes of operating our web site, providing our services, ensuring the security of our web site and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is specific consent OR our legitimate interests, namely the proper administration of our web site and business OR the performance of a contract

between you and us and/or taking steps, at your request, to enter into such a contract.

- 3.4 We may process information that you post for publication on our web site or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our web site and services. The legal basis for this processing is specific consent OR our legitimate interests, namely the proper administration of our web site and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.5 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is specific consent OR our legitimate interests, namely the proper administration of our web site and business OR the performance of a contract between you and us and/or the taking steps, at your request, to enter into such a contract.
- 3.6 We may process information relating to transactions, including purchases of goods and/or services, that you enter into with us and/or through our web site ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The source of the transaction data is you and/or our payment services provider. The transaction data may be processed for the purpose of supplying the purchased goods and/or services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract; providing that, if you are not the person contracting with us, the legal basis for this processing is our legitimate interests, namely the proper administration of our web site and business.
- 3.7 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is specific consent OR our legitimate interests, namely communications with our web site visitors and service users OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.8 We may process data arising from your use of training or consultancy services ("**service data**"). This data may include personal needs analysis data, performance data and other data arising out of a training or consultancy relationship. The source of this data is you. The service data may be processed for the purpose of supplying the purchased services and keeping proper records of those transactions. The legal basis for this processing is specific consent OR our legitimate interests, namely the performance of a service for you and the maintenance of appropriate records relating to that service OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- 3.9 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.10 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.11 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.12 Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. Providing your personal data to others

- 4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as is reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.2 Your personal data held in our web site database will be stored on the servers of our hosting services providers identified at <http://www.serversure.net/>. Data may also be held on the servers of Microsoft Corp identified at <https://www.microsoft.com/> as well as locally on employee computers.
- 4.3 We may disclose personal data to our suppliers or subcontractors insofar as is reasonably necessary for the provision of or to support us in the provision of our products and services.
- 4.4 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfers of your personal data

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

- 5.2 The hosting facilities for our web site are situated in the United Kingdom.
- 5.3 Microsoft Corp is situated in the USA. The European Commission has made an "adequacy decision" with respect to the data protection laws of the USA. Transfers to the USA will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from <https://privacy.microsoft.com/en-gb/privacystatement>.
- 5.4 You acknowledge that personal data that you submit for publication through our web site or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data as follows:
- (a) usage data will be retained for a period of 38 months following the date of collection of the latest activity by that user;
 - (b) account data will be retained for a period of 36 months following the date of closure of the relevant account, and for a maximum period of 60 months following the last activity of an account that is not closed;
 - (c) publication data will be retained for a period of 36 months following the date when the relevant publication ceases to be published on our web site or through our services;
 - (d) enquiry data will be retained for a minimum period of 6 years following the date of the enquiry, and for a maximum period of 1 year following that date;
 - (e) transaction data will be retained for a minimum period of 6 years following the date of the transaction, and for a maximum period of 1 year following that date;
 - (f) notification data will be retained for a period of 36 months following the date that we are instructed to cease sending the notifications, providing that we will retain notification data insofar as necessary to fulfil any request you make to actively suppress notifications; and
 - (g) service data will be retained for a minimum period of 36 months following the date of completion of the service from which it arose, and for a maximum period of 36 months following that date.
- 6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal

obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Your rights

7.1 In this Section 7, we have listed the rights that you have under data protection law.

7.2 Your principal rights under data protection law are:

- (a) the right to access - you can ask for copies of your personal data;
- (b) the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) the right to erasure - you can ask us to erase your personal data;
- (d) the right to restrict processing - you can ask us to restrict the processing of your personal data;
- (e) the right to object to processing - you can object to the processing of your personal data;
- (f) the right to data portability - you can ask that we transfer your personal data to another organisation or to you;
- (g) the right to complain to a supervisory authority - you can complain about our processing of your personal data; and
- (h) the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

7.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

8. About cookies

8.1 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 is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

9.1 We use cookies for the following purposes:

- (a) authentication and status - we use cookies to identify you when you visit our web site and as you navigate our web site, and to determine if you are logged into the web site;
- (b) personalisation - we use cookies to store information about your preferences and to personalise the web site for you;
- (c) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our web site and services generally;
- (d) analysis - we use cookies to help us to analyse the use and performance of our web site and services; and
- (e) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

10. Cookies used by our service providers

10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our web site.

10.2 We use Google Analytics. Google Analytics gathers information about the use of our web site by means of cookies. The information gathered is used to create reports about the use of our web site. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>.

11. Managing cookies

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

- (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-web-site-data-sfri11471/mac> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many web sites.

11.3 If you block cookies, you will not be able to use all the features on our web site.

12. Amendments

12.1 We may update this policy from time to time by publishing a new version on our web site.

12.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

12.3 We may notify you of significant changes to this policy.

13. Our details

13.1 This web site is owned and operated by Pete Sharma Associates Ltd.

13.2 We are registered in England and Wales under registration number 671105, and our registered office is at 1 Hill View Cottages, The Drove, Blackfield, England, SO45 1XB.

13.3 Our principal place of business is at 1 Hill View Cottages, The Drove, Blackfield, England, SO45 1XB.

13.4 You can contact us:

- (a) by post, at the postal address given above;
- (b) using our web site contact form;
- (c) by telephone, on the contact number published on our web site; or
- (d) by email, using the email address published on our web site.