



DATA PRIVACY & COOKIES POLICY - 2021

1. INTRODUCTION

- 1.1 This privacy notice gives you details of how **Jules Tyler Services** will collect and process your personal data within our business and through the use of our site www.jules-tyler.com, including information you may provide to us when you sign up to any of our marketing opt-ins or waiting list for services.
- 1.2 **Jules Tyler Services** are the data controller, and we are responsible for processing your personal data.

Company Name	Jules Tyler Services
Email address	hello@jules-tyler.com
Telephone number	7932 606895
Data Officer	Julie Tyler
Data Regulator	Our Data Officer is registered with the ICO under number ZB094978 https://ico.org.uk/
Data Retention Period(s)	6 weeks after end of a booking or from removing yourself from our marketing lists
Card and payment processor (3rd party) names and their security policy links	Stripe https://stripe.com/docs/security/stripe
Third parties we share information with:	Associates contracted to Jules Tyler Services
Date this Policy last updated	March 2022

2. WHOSE INFORMATION DO WE COLLECT?

- 2.1 We process information about:

"Clients"	Client who have bought services from us, and "Client Contacts" who are individuals employed by or contracted to Clients;
"Suppliers"	Suppliers or potential Suppliers of goods or services to us;
"Associates"	Associates or potential Associates of services to us;
"Prospects"	contacts working at or connected with potential Clients;

3. OUR POLICY

- 3.1 We ensure the correct treatment of all personal data collected and processed by us. Our Privacy Policy explains how we achieve that by confirming when and why we collect information, how we use it, when other people can see or use it, and how we keep it secure. We can assure you we never sell or trade email lists.
- 3.2 We keep this Privacy Policy under review, and we may regularly revise it from time to time. Please ensure you check back to ensure you always have the most up-to-date information.

4. OUR APPROACH TO PERSONAL DATA

- 4.1 We're committed to protecting your privacy and honouring your legal rights to control how we use your personal data. We only collect and use personal data when needed for one of the following reasons:
- you have asked us to do something (for example, send you marketing information);
 - so that we can reply to queries or complaints;
 - to develop and manage our business relationships;
 - to help grow our business and fulfil our contracts;
 - to provide services to clients;
 - to calculate payments to associates or Affiliates/Referrers; and
 - to meet our legal obligations.
- 4.2 We try to make sure the information we hold is accurate and up to date and that we never retain more than we need.

5. CATEGORIES OF DATA

- 5.1 We may process information about you that you have yourself provided to us or which is published generally on the internet through social media or on other websites.
- 5.2 In all cases, we will have what identifying and communication information that is relevant and that we can sensibly obtain: that is, your name, email address, business name, position, contact address and we may also capture some of the information published by you in the public domain to the extent that it may be relevant to our interactions.
- 5.3 If you are or work for a prospect, we will aim to obtain and process information that is relevant to our building a business relationship with you and doing business together, which may relate to your business and your personal interests.
- 5.4 If you are or work for a customer or supplier, we will also keep records of our interactions, the work we have done for you or commissioned from you, the progress of work, and financial and accounting records.
- 5.5 If you have any questions or concerns about our use of your information, or how we have responded to any request about your personal data, please take it up in the first instance by emailing us at the above address. If we cannot come to an agreement, the official authority's contact details are set out above, and you can raise your concerns with them.

6. DOWNLOADS, NEWSLETTERS AND SERVICES

- 6.1 We may monitor who opens what in our newsletter lists, and pre-set sequences of information we send you to monitor popularity. You may also trigger sub-routines if you click on certain links or articles, these are designed to offer you more information about what you may be interested in. You can unsubscribe from these sequences at any time.
- 6.2 Existing Clients may receive emails about specific offers relating to things you have already purchased. You can unsubscribe from these at any time.
- 6.3 We use automations (little sequences of emails that start when you ask for something in particular) to send you the information you asked for, to send you products you have bought and to administer services you have subscribed to. You can unsubscribe from these at any time.
- 6.4 We use anonymised data about you from time to time to target advertising campaigns based on profiling the sort of person who wants to receive information from us.
- 6.5 We ask our own sales and marketing people (both internal and external) to contact Prospects from time to time. This is normally because you have requested a call, or because we are actively trying to let you know about something you may benefit from.

7. SOCIAL MEDIA

- 7.1 We have an active presence on social media. If you are using social media they are holding and using your information in accordance with their data privacy policy.
- 7.2 If you 'like' any of our posts or 'follow' us or contact us on social media we keep a record of that. Your replies to us, messages you send us, and your other activity linked to our posts may be seen by members of our staff and by our associates. Our contracts with them hold them to high standards of protecting your information.

8. NO SALE OR EXCHANGE OF YOUR DATA

We never sell or exchange your personal data with organisations who may want to sell you something or use your data for research or other purposes.

9. DATA LOCATION AND PLATFORMS

Like most small businesses, we do not have any tailor-made software – we use mainstream packages for everything from our Client records, to email, to accounting.

10. WE MAY SHARE SOME OF YOUR DATA WITH THESE PEOPLE

- 10.1 We have an outsourced support team for our own business which may include Virtual Assistants, Web Designers, IT support, Sales and Marketing, Accounting and more. They have limited access to your data, where the service they provide to us means they need it. For example, if we invoice you, our Accountant needs to process the information in the invoice.

- 10.2 Our team use our software to access any data they need. We do not permit copying or sharing by the team and actively monitor for any potential breaches.
- 10.3 Your information/advice is held in the strictest confidence. Our team are all contracted to strict confidentiality clauses.
- 10.4 We restrict who can export or download data that is held to a limited number of individuals who are authorised to back up data.

11. HOW LONG DO WE KEEP YOUR DATA FOR?

- 11.1 Your information will be kept for the length of time set out in our retention period above.
- 11.2 If you subscribed to a newsletter or updates list, you will remain on the list(s) you joined until you unsubscribe from that list.

12. IF YOU WANT TO SEE WHAT WE HOLD ON YOU

- 12.1 If you want to know what information we have about you (if any) email the address above and give us your name, email address(es). We may require you to confirm your identity before proceeding.
- 12.2 Provided we can legitimately disclose the information to you, we will happily do a search and send you screenshots of what we have.

13. YOUR RIGHTS

- 13.1 You have the right to know what information we are collecting on you, and to amend it if it is inaccurate.
- 13.2 If you feel for some reason we have information we should not be keeping, or it is out of date or otherwise wrong, please let us know via the email above and we will take appropriate action.
- 13.3 Most of the information we hold is not based on your individual consent but is based on our needing the information to run our business and provide our products and services.
- 13.4 You have a "right to be forgotten" - but that does have some legal limits to it. If you want us to remove information about you, let us know. If you have been a Client, we may not be able to remove all data as we will have to ensure that we can continue to comply with legal, accounting, taxation and our insurer's requirements.

14. OUR LEGAL BASIS FOR PROCESSING YOUR DATA

- 14.1 Signing onto our newsletter list is by your consent – and when you withdraw your consent we stop that processing of your data.
- 14.2 Apart from marketing, the information we hold is based on our needing the information to run our business and provide our products and services. In a few situations we are processing personal data because we are under a legal obligation to do so. This principally relates to our business, accounting and tax records.

15. PROSPECTS

- 15.1 Most of the information we process comes from you. We process it so we can reply to you, and when you contact us again we know the history of our contact. Typically, we may collect name, contact details, how we came across you, and background information from you or published by you on social media or freely accessible on the internet, on why you might be interested in our products or services or a relevant contact for our business.
- 15.2 If you sign up to a newsletter list, you will be sent what you asked for. You can unsubscribe at any time by clicking the unsubscribe button on any email.
- 15.3 You are not automatically subscribed to any other lists but may be invited to join an appropriate one.
- 15.4 If we email you individually using our own email system or respond to an email sent to us at any of our business email addresses, a copy of that email will also be stored.
- 15.5 If you make an enquiry via our website, we will keep details of that enquiry and response for our data retention period above.
- 15.6 We do not routinely keep special category data. To the extent we hold this, it was supplied or made publicly available by you.

16. CLIENTS

- 16.1 Once you buy something from us, we will collect information from you at the point of sale.
- 16.2 This will include the information we collect from Prospects (above). We collect your email address, phone number and postal address so we can provide what we have contracted to, invoice you and keep proper records of our business relationship.
- 16.3 We process your data to support the delivery the goods and services you have bought. We keep records of the goods/services provided to you, and information you give us, so we can support you when needed and advise you of any additional services you may need.

17. THIRD PARTY DATA

As well as your own personal data, we understand that you may need to provide us with personal data relating to your employees, your workers, or third parties (often your clients or suppliers) – depending on the services we are providing to you. We hold all such information under strict confidentiality obligations, as set out in our terms of business.

18. FINANCIAL AND CREDIT CARD DETAILS

- 18.1 We only accept BACS or direct transfer. In these instances we know only what the bank tells us, which is usually the name of the person who paid us and how much and the reference number.
- 18.2 We do not accept credit card payments or any other payments.
- 18.3 We do not keep credit scores nor use credit reference agencies.

19. THIRD PARTY INFORMATION

- 19.1 We will act in accordance with your statutory rights, subject to the exclusions and exemptions that may apply.
- 19.2 When we are processing data about you on behalf of a Client, we are operating under the banner of our Client's data privacy policy. We will refer any enquiry from you to them, as they are the 'data controller' responsible for dealing with your query. But we will support that by providing relevant information to our Client for passing to you.
- 19.3 When we are processing data about you because of a direct connection between you and our business we are acting as a 'data controller' (and operating under this policy).

20. SUPPLIERS, ASSOCIATES AND AFFILIATES

- 20.1 If you become a supplier, associate or an Affiliate/Referrer we keep a copy of the contract between us, and your bank details so we can pay you. We also keep a record of invoices/payments for accounting purposes.
- 20.2 We keep a record of the work you undertook for us/our clients along with any comments, reviews or suggestions about that work including complaints (if any) and their resolution.
- 20.3 This information is all needed to manage our Client relationships and our supply chain.
- 20.4 If we set up an Affiliate/Referrer scheme, Affiliate/Referrer data will be held in accordance with this policy. We will ask you for information when you apply, and that information will be kept to administer the scheme.
- 20.5 If you are a Referrer, we remind you that referrals that you make to us may only be made with the knowledge and consent of the person being referred.

21. COMPLAINTS

- 21.1 If you have a complaint about the way we are handling your information or how we have responded to a request for information or removal, you can take this up in the first instance by emailing us at the email address set out above.
- 21.2 If we can't come to an agreement, the relevant authority's details can be found above.

COOKIES POLICY

Jules Tyler Services' website may gather information about your general Internet use by using cookies in order to help you personalise your online experience. Where used, these cookies are downloaded to your computer automatically. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

“Essential” cookies are automatically placed on your computer or device when you access our website or take certain actions on our website. ‘Non-essential’ cookies and other technologies are only placed on your computer or device if you have consented to us doing so. You consent to us placing non-essential cookies on your computer or device by continuing to use our website with your browser settings set to accept cookies.

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.

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

We use cookies for the following purposes:

authentication – we use cookies to identify you when you visit our website and as you navigate our website;

analysis – we use cookies to help us to analyse the use and performance of our website and services; and

cookie consent – we use cookies to store your preferences in relation to the use of cookies more generally.

Some of our service providers also use cookies and those cookies may be stored on your computer when you visit our website. These are the third-party service providers that store cookies when you visit our website:

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's Privacy Policy is available at: [https://www.google.com/policies/privacy/.](https://www.google.com/policies/privacy/))

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer.