# **Privacy Policy**

# **Background**

Braiswick Photographic Company Co Ltd ("Braiswick") understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website and is committed to protecting their personal information. Our Privacy Policy explains how we collect, use and protect information about you.

## Topics covered in our privacy policy:

- 1. Who we are
- 2. What is personal data?
- 3. What are my rights?
- 4. What personal data we collect and why?
- **5.** Sharing your information
- 6. Session/cookies
- 7. Marketing
- 8. Accessing your personal data
- 9. Payment
  - 9.1 Secure Server
  - 9.2 System Security Testing
- 10. Changes to Privacy Policy
- 11. Transfers outside the UK
- **12.** Further Information

#### 1. Who we are

Braiswick Photographic Co Ltd ('Braiswick), a company incorporated in England and Wales, registered number 00858354. Registered office is at Wesley House, Cattawade, Manningtree, Essex CO11 1RJ. We are Data Protection registered with the 'Information Commissioners Office' (ICO), registration number Z6209401

### 2. What is personal data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively "the Data Protection Legislation") as any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but also covers information such as identification numbers, electronic location data, and other online identifiers.

#### 3. What are my rights?

Under the Data Protection Legislation, you have the following rights which we are committed to uphold:

- a) the right to be informed about the use of your personal data.
- b) the right to access the personal data we hold for you.
- c) the right to have your personal data rectified if any that we hold is inaccurate or incomplete.
- d) the right to be forgotten, you can request that we delete/dispose of any personal information that we hold for you.
- e) the right to restrict the processing of your personal data.

- f) the right to object to us using your personal data for a particular purpose.
- g) the right to withdraw consent. (If we are need your consent as the legal basis to use your personal data, you can withdraw that consent at any time).
- h) the right to data portability. If you have provided personal data to us directly which we are using with your consent and that data is processed using automated means, you can request a copy of that personal data to reuse with another service.
- i) rights relating to automated decision making we do not do this in any way.

Further information regarding your rights can be obtained from the Information Commissioner's Office.

# 4. What personal data we collect and why?

Our site collects certain information automatically, including your IP address and type of browser you are using, this information is only used in the event of a query.

When you register to use our website to place an order, we will collect your name, address, contact number, email, and any other information you choose to send us. This enables us to provide the service of producing and sending your products ordered (either electronically or physically).

The lawful basis under the Data Protection Legislation that allows us to use such information is article 6 of the UK GDPR. Which allows us to process personal data when necessary for the purposes of legitimate interests. In this case the proper operation and functionality of our site is to provide our service.

We only store your personal data in the UK which means you are protected under the Data Protection Legislation.

## 5. Sharing your information

Braiswick will not use or share your personal identifiable information with any third party without your permission, unless we are legally required to by enforcement agencies in the context of actual or threatened legal proceedings, provided it does not breach data protection laws.

## 6. Sessions/Cookies

Braiswick does not use cookies on our website, however when someone visits our site Google Analytics collects standard internet log information and details of visitor behaviour patterns. This is to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make any attempt to find out the identities of those visiting our website. Google's privacy policy is available at: <a href="https://www.google.com/policies/privacy">https://www.google.com/policies/privacy</a>

When customers are using our online ordering service, sessions are created on our own server. This is assigned a unique session ID which allows the website to function properly. Data is only available during the page session. Changes made are saved and available for the current page on our server. Once the tab/window is closed the session will expire after 20 minutes idle the data is then deleted.

#### 7. Marketing

We are subject to certain rules and privacy laws when marketing to our customers. For example, a 'data subject's' prior consent is required for electronic direct marketing (email, text or telephone call). The limited exception for existing customers known as "soft opt in" allows organisations to send marketing texts or emails if we have obtained contact details during a sale, if we are marketing similar products or services. We also give the person an opportunity to opt out of marketing when first collecting the details

and in every subsequent message.

The right to object to direct marketing must be explicitly offered to the 'data subject' in an intelligible manner so that it is clearly distinguishable from other information.

## 8. Accessing your personal data

Personal data that we process for any purpose shall not be kept for longer than is necessary to provide our services.

You are entitled to view, amend or delete the personal information that we hold. Subject Access requests from individuals should be made by email or telephone. Addressed to the Data Controller, Debbie Crees at <a href="mailto:d.crees@braiswick.co.uk">d.crees@braiswick.co.uk</a> or 01206 399800. The Data Controller can supply a standard request form, although individuals do not have to use this.

The Data Controller will provide the relevant data within one month of your request; however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If additional time is required, the data subject shall be informed.

The Data Controller will always verify the identity of anyone making a subject access request before handing over any information.

### 9. Payment

The most convenient way for you to pay for photographs from our site is by secure on-line credit card payment or Paypal. To make this possible this site contains a link to one other site, that of Sage Pay who are our chosen Credit Card Authorisation Bureau. If you wish to review their Privacy Policy, you can see this at their website <a href="https://www.opayo.co.uk">www.opayo.co.uk</a>.

#### 9.1 Secure server

Braiswick online orders website has a SHA-256 SSL certificate provided by DigiCert (Symantec Corporation, known for the Norton Antivirus). We use SSL certificates to keep our user data secure, verify ownership of our website, prevent attackers from creating a fake version of the site, and convey trust to our customers.

When you have placed your order, you are required to make a card payment or alternatively using digital wallet methods such as Paypal. You are transferred to the <u>SagePay.com</u> site, which means we do not process your financial information and therefore are not able to store it. Your payment, using <u>SagePay.com</u> system, is transacted through Secure Server Software, which encrypts payment status so it cannot be intercepted.

#### 9.2 System security testing

We are constantly reviewing the encryption methods and level of our digital files that are required to be transferred. We use security software to test our network for vulnerabilities.

Schools data is stored on a closed network with no outside connection to prevent cyber-attacks.

Wired and wireless network intrusion are tested every school term, network infrastructure is evaluated for hardware renewal if standard is not met.

Any faults are reported and addressed immediately.

## 10. Changes to our privacy policy

We may change our privacy policy from time to time. We will always update the privacy policy on our website, so please try to read it when you visit the website.

## 11. Transfers outside the UK

Personal data in the UK and the European Union is protected by data protection laws but other countries do not necessarily protect your personal data in the same way.

Personal data used by Braiswick Photographic Co Ltd should never be transferred outside of the UK without consent.

#### 12. Further Information

If you would like further information about data protection, or if you would like to view the register of Data Controllers, you can visit the Information Commissioner's site at <a href="https://www.ico.gov.uk">www.ico.gov.uk</a>.

Thank you for visiting our website.