

PRIVACY POLICY

Last updated 21 May 2022

Introduction

1.1 We are committed to safeguarding the privacy of our website visitors and service users.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

1.4 In this policy, “we”, “us” and “our” refer to New Dawn - Cornwall. For more information about us, see Section 13.

Credit

2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

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 website 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 website 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. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for

this processing is our legitimate interests, namely monitoring and improving our website and services.

3.3 We may process your account data (“account data”). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

3.4 We may process your personal data that are provided in the course of the use of our services (“service data”). The service data may include your personal and company details such as name, address, phone number and email address. The source of the service data you. The service data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and/or the performance of a contract between you and us.

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 consent.

3.6 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website (“transaction data”). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and 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 and our legitimate interests, namely our interest in the proper administration of our website 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.

3.8 We may process information contained in or relating to any communication that you send to us (“correspondence data”). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

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 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.

3.11 Please do not supply any other person’s personal data to us, unless we prompt you to do so.

Providing your personal data to others

4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.

4.2 Financial transactions relating to our website and services are handled by our payment services providers, Stripe, PayPal, WePay, GoCardless or SamCart. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers’ privacy policies and practices on their own websites.

4.3 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.

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 email hosting facilities for our website are situated in the USA. The European Commission has made an “adequacy decision” with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

5.3 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

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) personal account data for a minimum of 12 months and a maximum of 60 months

6.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) the period of retention of personal information will be retained if you have opted in to our system, until such a time you opt out

6.5 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.

Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

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

Your rights

8.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

(a) the payment of a fee (currently fixed at GBP 10); and

(b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

8.2 We may withhold personal information that you request to the extent permitted by law.

8.3 You may instruct us at any time not to process your personal information for marketing purposes.

8.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

About cookies

9.1 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.

9.2 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.

9.3 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.

Cookies that we use

10.1 We use cookies for the following purposes:

(a) authentication – we use cookies to identify you when you visit our website and as you navigate our website

(b) status – we use cookies to help us to determine if you are logged into our website

(c) personalisation – we use cookies to store information about your preferences and to personalise the website for you

(d) 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 website and services generally

(e) advertising – we use cookies [to help us to display advertisements that will be relevant to you

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

Cookies used by our service providers

11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

11.2 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/>.

Managing cookies

12.1 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. We recommend contacting a professional IT support person for further help/assistance on this.

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you may not be able to use all the features on our website.

Our details

13.1 This website is owned and operated by New Dawn - Cornwall

13.2 Our principal place of business is Glynndawny, Enniscaven, St. Austell, Cornwall PL26 8DE

13.4 You can contact us:

(a) by post, to the postal address given above;

(b) using our website contact form;

(c) by telephone, on the contact number published on our website

Data Protection Officer

14.1 Our data protection officer's contact details are: Emma Matthews, New Dawn - Cornwall