Kirsty Carr Limited

Privacy Policy

Introduction

Welcome to Kirsty Carr Limited's privacy policy. We have also included our Data Complaints Policy at the end of this document, should you need it.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you about how we look after your personal data and tell you about your privacy rights and how the law protects you.

It contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to data protection laws which apply across the European Union and the United Kingdom and we are responsible as 'controller' of that personal information for the purposes of those laws.

By providing us with your data, you warrant to us that you are over 13 years of age.

Important information and who we are:

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data which may be collected directly from you – in person, by telephone, text or email, when you fill in our contact form or book a call.

It is important that you read this privacy policy so that you are fully aware of how and why we are using your data.

Data relating to children

This website is not intended for children and we do not knowingly collect data relating to children.

Controller

Kirsty Carr Limited is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our", in this privacy policy.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us. Our full details are:

Kirsty Carr Limited:

Kirsty Carr:

hello@the-cns.com

Grosvenor House, 3 Chapel Street, Congleton, Cheshire, CW12 4AB

Complaints

You have the right to make a complaint about how we handle your personal data. We care deeply about your data protection rights so please contact us first so we can try to resolve the problem for you. Please contact us using the details above in the first instance, stating 'Data Complaint' in the subject heading of the email or letter. We will acknowledge your complaint within 30 days of receiving it. Our data complaints policy is at the end of this document.

If you are not satisfied with the way we deal with your complaint, you can make a complaint to the data protection authority of the country in which you are based. In the UK, this is the Information Commissioner's Office (ICO) (www.ico.org.uk).

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, delivery or postal address, email address and telephone numbers.
- **Transaction Data** includes details about purchases of goods and services, including payments to and from you, card details and other details of products and services you have purchased from us.
- **Profile Data** includes your user name or password**,** purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity.

Sensitive Data

Sensitive data refers to data that includes details about your health, race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and criminal convictions and offences.

We do not collect any sensitive data about you.

Automated Processing

We do not carry out automated decision making or any type of automated profiling.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Transaction Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide, including but not limited to when you:

- Enquire and/or purchase our products or services;
- subscribe to our service or publications;
- request marketing to be sent to you;
- request sales information to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback or contact us.
- provide a testimonial

Analytics

- We may receive technical personal data about you from analytics providers such as Google.
- We may receive Contact and Transaction Data from providers of technical, payment and delivery services such as PayPal or Stripe.

2. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- To keep you updated about our products and services where you have consented to this or it is within our legitimate interest to do so. We shall send this information to you by email or post. You have the right to withdraw consent to marketing at any time by sending us an email to hello@the-cns.com, or by clicking on the 'unsubscribe' button in our emails.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Transaction (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers

(b) Asking you to leave a review, provide a testimonial or take a survey	Communications	use our products/services)
To enable you to take part in a competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Our lawful ground for processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business) or our recognised legitimate interests (for direct marketing).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this

marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- External Third Parties such as service providers, professional advisers, HMRC, government bodies and regulators; and
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

4. International transfers

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA)and/or the UK, eg:

- if you are based outside the EEA and/or the UK;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law.

If you are based in the UK We are subject to the provisions of the UK General Data Protection Regulations that protect your personal data. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government, or;

- If we use US-based providers that are part of the UK-US Data Bridge (the UK extension to the EU-US Data Privacy framework) we may transfer data to them as they have equivalent safeguards in place; or
- Where we use certain service providers outside of the UK, we may use specific contracts or codes of conduct approved by the UK regulators which give personal data the same protection it has in the UK.

If you are based within the EEA We are subject to the provisions of the EU General Data Protection Regulations that protect your personal data. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- we may use US based providers that are part of the EU-US Data Privacy framework, as they have equivalent safeguards in place; or
- where we use certain service providers outside of the EEA, we may use specific contracts or codes of conduct approved by EU regulators which give personal data the same protection as it has in the EEA.]

5. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. Personal Data and AI

We shall only submit personally identifiable client data into AI platforms to the extent that such submission complies with GDPR and any other applicable legislation. We shall implement appropriate safeguards and comply with applicable data protection laws whenever we use AI.

7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see ‘Request erasure’ below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us by email at hello@the-cns.com

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Changes to this privacy policy

We may change this privacy policy from time to time.

Data Complaints Policy

1. We are committed to providing a high-quality service, in accordance with data protection law. At all times, we seek to comply with data protection principles by ensuring we:

- process personal data lawfully, fairly and in a transparent way;
- collect personal data for specific and legitimate purposes and do not process personal data in a way that is incompatible with those purposes;
- collect and use adequate, relevant and minimal personal data;
- take reasonable steps to make sure personal data is accurate and kept up to date;
- do not keep personal data longer than necessary; and
- implement appropriate security measures.

2. We acknowledge that we may not always get things right, so if something has gone wrong, we need you to tell us. This will help us to improve our standards of service and data protection controls.

3. How to make a complaint

3.1. You can contact us in writing (by email to the following email address *hello@the-cns.com*, using the words 'Data Complaint ' in the subject heading. Alternatively you can send a letter to the postal address set out in our Privacy Policy.

4. Acknowledging and verifying your complaint

4.1. We will contact you within 21 days acknowledging your complaint.

4.2. We will take reasonable steps to verify the identity of the person making the complaint. This may involve requesting further information or documentation from you. If the complaint is made on behalf of someone else, we will also need to check that the person making the complaint is properly authorised to do so.

4.3. If, having requested additional information, we are not in a position to identify the person making the complaint or we are not satisfied that they have proper authority to make the complaint, we may refuse to deal with it - see section 7.2.1 below.

5. Investigating your complaint

5.1. We will investigate your complaint. This will usually involve:

5.1.1. reviewing your complaint;

5.1.2. locating and reviewing the records we hold about you;

5.1.3. establishing the relevant facts; and

5.1.4. liaising with individuals who you may have dealt with.

5.2. We may also need to ask you for further information or documents. If so, we will ask you to provide the information within a specific period of time.

5.3. We will update you on the progress of your complaint at appropriate times.

6. Notifying you of the outcome of our investigation

6.1. We will contact you at the end of our investigation to tell you what we have done and what we propose to do to resolve your complaint.

6.2. We usually aim to do this within 30 days of the date of receiving your complaint. However, this time period may be extended where:

6.2.1. we ask you to provide further information to verify your identity or your authority to make the complaint, or in relation to the complaint itself;

6.2.2. your complaint is complex or involves locating and/or reviewing a large volume of information; or

6.2.3. you have made several complaints, which we need to investigate at the same time.

6.3. We will tell you if we need more time to properly investigate your complaint and explain why.

7. Refusing to deal with your complaint or charging a fee

7.1. We prefer to deal with complaints and, preferably, to resolve them. We will not usually charge a fee for handling a complaint.

7.2. We may, however, refuse to deal with a complaint where:

7.2.1. after requesting additional information in accordance with section 4.2, we are not in a position to identify you and/or to verify that you are authorised to make the complaint; or

7.2.2. we have asked for more information in relation to the complaint itself (section 5.2), but you have not provided this within a reasonable time.

7.3. Where we consider the complaint to be manifestly unfounded or excessive, eg because you have made the same complaint repeatedly, we may:

7.3.1. refuse to act on the complaint; or

7.3.2. charge a reasonable fee for dealing with the complaint, based on our reasonable administrative costs - we will notify you of the proposed fee in advance of incurring it.

8. What to do if we cannot resolve your complaint

8.1. If you are unhappy with the outcome of your complaint, you can complain to the data protection authority of the country where you are based. In the UK this is the Information Commissioner's Office (ICO), or you can seek to take action in the courts.

8.2. The ICO's contact details are:

Address	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Helpline number	0303 123 1113

More details on how to complain to the ICO are available on the *Complaints page* of the ICO's website. You should usually submit your complaint to the ICO or other data protection authority within three months of your last contact with us.