



## Leo Genealogy Consultancy

### Privacy Policy Version 1.2 (5 February 2022)

#### Purpose and scope

1. This policy applies between customers and/or users of the website [www.leogenealogy.co.uk](http://www.leogenealogy.co.uk) and Alexandra Albus t/a Leo Genealogy Consultancy. It fulfils the requirements of the UK General Data Protection Regulation (GDPR) for the right to be informed about the processing of personal data.
2. Information collected about persons who are deceased, for the purposes of historical research, is out of scope of this policy because GDPR legislation only applies to living individuals.

#### The type of personal information I collect

3. I currently collect and process the following information:
  - Personal identifiers, contacts and characteristics (for example, name and contact details) and customer financial information as part of a business relationship
  - Personal identifiers and characteristics including special category data (for example ethnicity and religious beliefs) used to complete a family tree ('pedigree') where a living person is captured in that tree
  - Aggregated, anonymous information is collected as part of gathering website user statistics through the placement of cookies (please see the Cookie Policy for more information). It is possible the personal information held about you may be linked – directly, or indirectly – to the information obtained from and stored in cookies.

#### How I get the personal information and why I have it

4. Most of the personal information I process is provided to me directly by you for one of the following reasons:
  - Making an enquiry to my email address or via Facebook Messenger
  - Undertaking a pre-contract needs assessment where you tell me about yourself as part of the process of undertaking genealogical research
  - Information may be provided to me indirectly via Google Analytics, which provides website users statistics (see Cookie Policy for more).
5. I use the information that you have given me in order to provide an effective genealogical research service on a consultancy basis.
6. I do not share this information outside of the business relationship.
7. Under the General Data Protection Regulation (GDPR), the lawful bases I rely on for processing this information are:
  - (a) **Your consent.** You are able to remove your consent at any time. You can do this by contacting [support@leogenealogy.co.uk](mailto:support@leogenealogy.co.uk)



- (b) **I have a contractual obligation**, because you have asked me to take specific steps before entering into a contract, such as providing an estimate for the costs of my services following an enquiry you have made.
- (f) **I have a legitimate interest** – processing personal data is necessary for the legitimate interests of a third party (the customer), unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. The legitimate interest is my fulfilment of genealogical research, such as preparing a family tree (or 'pedigree'), which may not be possible without the processing of personal data relating to other living individuals and any special category data relating to those individuals would be processed under Article 9(2) condition (j) Archiving, research and statistics. Indeed, those individuals might reasonably expect that their personal information would be included as part of research undertaken into your shared family history. While a legitimate interest still exists for the processing of personal information about children, I may determine that their protection overrides this interest and instead apply the legal basis of consent, obtained either from a person with parental responsibility (if the child is under 13 years of age) or the child themselves.

### How I store your personal information

8. Your personal information is securely stored in online cloud-based facilities protected with two-factor authentication and within an email account server which utilises multiple encryption technologies.
9. I keep your personal information pertaining to our business relationship (personal identifiers, contacts and customer financial information) for a period of six years in order to fulfil the requirements of HM Revenue and Customs (HMRC).
10. I keep the genealogical research work and/or family tree ('pedigree') work I prepare as part of your customer order for a period of two years.
11. I will then dispose your information by deleting it from electronic storage.

### Your data protection rights

12. Under data protection law, you have rights including:
  - **Your right of access** - You have the right to ask me for copies of your personal information.
  - **Your right to rectification** - You have the right to ask me to rectify personal information you think is inaccurate. You also have the right to ask me to complete information you think is incomplete.
  - **Your right to erasure** - You have the right to ask me to erase your personal information in certain circumstances.
  - **Your right to restriction of processing** - You have the right to ask me to restrict the processing of your personal information in certain circumstances.
  - **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
  - **Your right to data portability** - You have the right to ask that I transfer the personal information you gave me to another organisation, or to you, in certain circumstances.



13. You are not required to pay any charge for exercising your rights. If you make a request, I have one month to respond to you. Please contact [support@leogenealogy.co.uk](mailto:support@leogenealogy.co.uk) if you wish to make a request.

### **How to complain**

14. If you have any concerns about our use of your personal information, you can make a complaint to me via email to [support@leogenealogy.co.uk](mailto:support@leogenealogy.co.uk) or by post to Leo Genealogy Consultancy, Office 95008, PO Box 15113, Birmingham, B2 2NJ.

15. You can also complain to the ICO if you are unhappy with how I have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

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## Leo Genealogy Consultancy

### Cookie Policy Version 1.0 (1 February 2022)

#### Purpose and scope

This website ([www.leogenealogy.co.uk](http://www.leogenealogy.co.uk)) uses cookies to help customise the website and improve the user's experience of the website. This policy explains what these cookies are for and how website users can opt out of cookies being used when they visit the website.

This policy applies between the user of this website and Alexandra Albus, the owner and provider of the website and should be read alongside and in addition to the Privacy Policy.

#### What are cookies and why are they important?

A cookie is a small text file placed on your computer by this website when you visit certain parts of the website and/or when you use certain features of the website.

Cookies do not usually contain any information which personally identifies you, the website user. However, personal information that Alexandra Albus t/a Leo Genealogy Consultancy stores about you may be linked to the information obtained from and stored in cookies. For more information on how such information is processed, please refer to the Privacy Policy.

#### Your consent to use cookies

When you visit the website, and before this website places cookies on your computer, you will be presented with a pop-up message box requesting your consent. You can give your consent to the placing of cookies by clicking 'Accept' and you can deny your consent by clicking 'Decline'.

#### Types of cookies used on this website

Type of cookies	Purpose	Details
Analytical/performance cookies (provided by Google Analytics)	<p>These types of cookies allow the number of visitors to the website to be counted and for information to be gathered about how these visitors (website users) move about the website. This helps to improve the way the website works and how effective it is.</p> <p>Cookies are used to distinguish unique users as well as unique sessions from a single user. In order for Google Analytics to determine which traffic belongs to which user, a unique identifier associated with each user (unique user ID and a device ID) is sent with each website hit.</p>	<p>Google Analytics collects data about the following user interactions:</p> <ul style="list-style-type: none"><li>• page views</li><li>• page scrolls</li><li>• outbound clicks</li><li>• site search</li><li>• video engagement</li><li>• file downloads</li></ul>

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