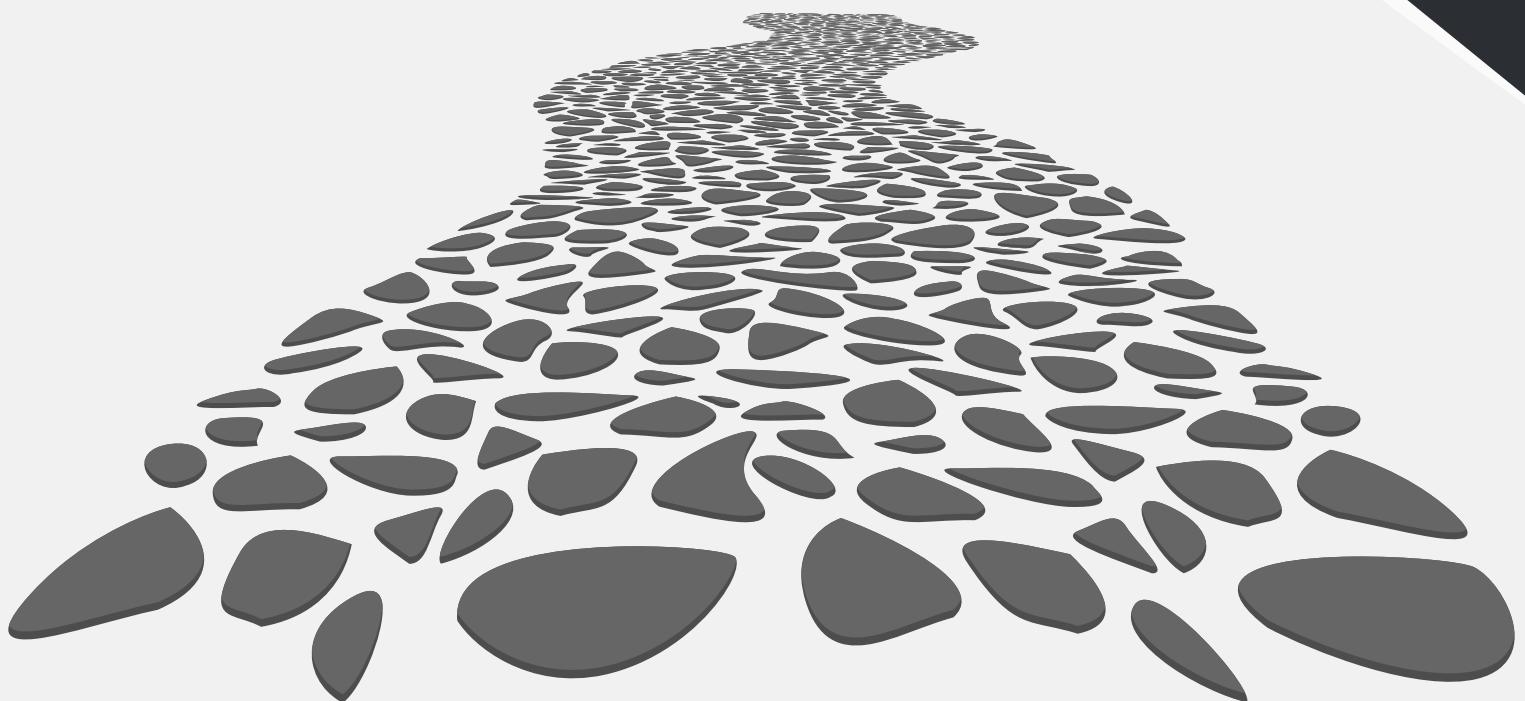




# PRIVACY POLICY

A guide for those involved with us.



## About This Policy

This policy describes how we use your data when you use our website ([www.nationalveteranswalk.co.uk](http://www.nationalveteranswalk.co.uk)) or when we provide services to you. We have provided this policy to ensure that you understand what personal data we may collect and hold about you, what we may use it for and how we keep it safe. You have legal rights to access the personal data that we hold about you and to control how we use it which are also explained.

## Reason for Policy

To ensure National Veterans Walk comply with its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 18).

## The 7 Principles of Data Protection

We will comply with the following data protection principles when processing personally identifiable information:

- We will process information fairly, lawfully and transparently.
- We will collect personal information for specified, explicit and legitimate purposes only, and will not process it in any manner incompatible with those legitimate purposes.
- We will only process the personal information that is adequate, relevant, and necessary for the relevant purposes.
- We will keep accurate and up-to-date personal information and take reasonable steps to ensure that inaccurate personal information is deleted or corrected without delay.
- We will keep personal information for no longer than is necessary for the purposes for which the information is processed.
- We will take appropriate technical and organisational measures to ensure that personal information is kept secure and protected against unauthorised or unlawful processing, and accidental loss, destruction, or damage.
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## Individual Rights

You have the following rights about your personal information:

- To be informed about how, why and on what basis that information is processed.

- To obtain confirmation that your information is being processed and to obtain access to it and certain other information, make a subject access request using the 'Contact Us' Form on our website.
- To have data erased if it is no longer necessary for the purpose for which it was originally collected/processed, or if there are no overriding legitimate grounds for the processing (this is sometimes known as 'the right to be forgotten').
- To restrict the processing of personal information where the accuracy of the information is contested, or the processing is unlawful (but you do not want the data to be erased).
- Have inaccurate personal data corrected, blocked or erased. Restrict our use of your data.
- Require that we delete your data (the "right to be forgotten").
- Require that we provide you, or anyone that you nominate, with a copy of personal data you have given us in a structured electronic form such as a CSV file. You can find full details of your data rights on the Information Commissioner's Office website at [www.ico.org.uk](http://www.ico.org.uk).

## What Personal Data We Collect About You

### Personal data that you provide to us

There are several ways in which you may share your data with us, for example, you may submit an enquiry via our website, post on social media sites that we run, or contact us by telephone, email or in person with a query or to provide feedback about our services. The personal data we collect from you in those situations would usually include your name, email and contact number. If you purchase one of our stones we will collect personal data such as name, rank, service number, the name of the armed forces you worked for and dates of service.

### Personal Data that we Receive from Third Parties

If we work with other businesses or use sub-contractors, such as the local council these parties may collect personal data about you which they will share with us and likewise we share with them. Some of our suppliers are external, in which case the personal data they collect during this time (as set out above) will be passed to us.

## Personal Data About Your Use of Our Website

This is technical information and includes details such as your IP address, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform. It also includes details of how you navigated to our website and where you went when you left, what pages you viewed or searched for, page response times, download errors, length of visits to certain pages, and page interaction information (such as scrolling, clicks, and mouse-overs).

## What We Use Your Data For

Personal data that you provide to us is used to:

1. Process and respond to any enquiries you make.
2. Suppose you have contacted us to arrange a stone for you or a family member. In that case, we will use your contact details to communicate with you to arrange this and to let you know the outcome of the order.
3. Register your data with our partners to fulfill the stone order.
4. Generate your certificate and send it to you.
5. Process payment for our services.
6. If you provide feedback following one of our sessions, we may post this on our website, social media sites or other promotional materials, as well as using this information to review and improve our services. We will only publish anonymised feedback unless you permit us to publish your details.
7. Manage and administer our business reviews and improve our service combined with the personal data that you provide to us and used for the purposes described above.

## Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our website. For detailed information on the cookies, we use and the purposes for which we use them see our Cookie policy.

## Consent and Other Legal Grounds for Processing Your Data

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day-to-day running of our business, we may use your data without asking for your consent because:

- We are entering into and carrying out our obligations under a contract with you.
- We need to use your data for our legitimate purposes (such as the administration and management of our business and the improvement of our services) and our doing so will not interfere with your privacy rights.
- We are subject to legal obligations that require us to use your personal data in certain ways (such as disclosing information to HM Revenue & Customs).
- In exceptional circumstances, we may wish to use your personal data for a different purpose which does require your consent. In these circumstances, we will contact you to explain how we wish to use your data and to ask for your consent. You are not required to give consent just because we ask for it. If you do give consent, you can change your mind and withdraw it later.
- The most common situation in which we will process your personal data on the grounds of consent is where we wish to send marketing communications to you. Please refer to the section on How we use your personal data for marketing to read about our marketing practices.

## How We Keep Your Personal Data Safe

We take every care to ensure that your personal data is kept secure.

The security measures we take include:

- Only storing your personal data securely
- Ensuring that our staff receive regular data security awareness training.
- Ensuring that we have entered into appropriate data-sharing agreements with our consultants and that our consultants are aware of the requirements under data protection law.
- Keeping paper records to a minimum and ensuring that those we do have are stored in a locked room.
- Maintaining up-to-date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems.

Unfortunately, sending information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

## How Long We Keep Your Personal Data

We only keep your personal data for as long as we need it. In practice this means that we will keep your personal data:

- If you purchase a stone with us, we will keep a copy of your name, contact details for such time that we are no longer in care of your stone.
- If you have enquired through our website we will keep your records for a maximum of 3 years.

Please note that we may anonymise your personal data or use it for statistical purposes. We keep anonymised and statistical data indefinitely, but we take care to ensure that such data can no longer identify or be connected to any individual.

If you have any questions about our data retention practices, please contact our 'Contact Us' page through our website.

## How You Can Make a Complaint

If you are unhappy with the way we have used your personal data, please contact us via our website. You are also entitled to make a complaint to the Information Commissioner's Office which you can do by visiting [www.ico.org.uk](http://www.ico.org.uk). Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

## Monitoring and Review

We will monitor all the feedback we receive concerning the issues affected by the Policy and amend the policy as necessary.

The Policy will be updated with any amendments to new or existing legislation, regulatory information and industry standards.

