

## Privacy and Cookie Policy



### 1 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 In this policy, "we", "us" and "our" refer to **Private Personal Assistant**.

1.4 By accessing our Site or our Service, you accept our Privacy Policy and Terms of Use (found here at <https://privatepersonalassistant.co.uk/terms-%26-conditions>) and you consent to our collection, storage, use and disclosure of your Personal Information as described in the Privacy Policy

### 2. How we use your personal data

2.1 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

(c) the legal basis 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 information that you post for publication on our website or through our services ("publication data"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business

3.4 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

3.5 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 consent

3.6 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

3.7 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

3.8 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks

3.9 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

3.10 Please do not supply any other person's personal data to us, unless we prompt you to do so

3.11 We may process information contained in any enquiry you submit to us regarding our services and products ("enquiry data"). If a user contacts us via email or via a contact form, the personal information transmitted by the user is automatically stored. Such personal data transmitted on a voluntary basis by a user to **Private Personal Assistant** are stored for the purpose of processing or contacting the user, managing our relationships with customers, keeping records of communication with the user, and promoting our products and services to customers. The personal information may include:

the user's contact information

the user's name

the name of the user's employer

the user's job title or role

the metadata associated with the communication

and information contained in communications between the user and **Private Personal Assistant**.

#### 4 Providing your personal data to others

4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure

4.2 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

#### 5 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 hosting facilities for our website are situated in UK. The European Commission has made an "adequacy decision" with respect to the data protection laws of this country

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

#### 6 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 Name and contact details submitted via our contact form will be retained for a minimum period of 1 day following access to the website and for a maximum period of 12 months following access to the website

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. The period of retention of name and contact details submitted to us will be determined based on whether a further contract of service engagement is signed to commence services

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

#### 7 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

## 8 Your rights

8.1 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights

8.2 Your principal rights under data protection law are:

- (a) the right to access
- (b) the right to rectification
- (c) the right to erasure
- (d) the right to restrict processing
- (e) the right to object to processing
- (f) the right to data portability
- (g) the right to complain to a supervisory authority
- (h) the right to withdraw consent

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

8.4 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee

8.5 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed

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

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

8.8 In practice, you will expressly agree in advance to our use of your personal information for marketing purposes

8.9 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement

8.10 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal

8.11 You may exercise any of your rights in relation to your personal data by written notice to us. **You can email [anna@privatepersonalassistant.co.uk](mailto:anna@privatepersonalassistant.co.uk)**

## 9 Complaints

9.1 A data protection complaint is any concern you raise about how we have collected, used, stored, shared or deleted your personal data.

Individuals may submit a data protection complaint by:

- Emailing: **[anna@privatepersonalassistant.co.uk](mailto:anna@privatepersonalassistant.co.uk)**;

9.2 The complaint should include:

- The complainant's name and contact details;
- Details of the concern;
- Relevant dates;
- Any supporting evidence; and
- The outcome sought.

9.3 Upon receipt of a complaint:

- The complaint will be logged in the Data Protection Complaints Register.
- A reference number will be assigned.
- Receipt of the complaint will be acknowledged within 30 calendar days.

The acknowledgement will:

- Confirm receipt;
- Provide the complaint reference number;
- Identify the person or team handling the complaint; and
- Explain the next steps in the process.

9.4 The organisation will investigate complaints without undue delay.

The investigation may include:

- Reviewing relevant records and systems;
- Interviewing relevant personnel;
- Examining policies, procedures and audit logs;
- Assessing compliance with applicable data protection legislation; and
- Seeking additional information from the complainant where necessary.

Following investigation, the organisation will communicate the outcome to the complainant without undue delay.

Possible outcomes include:

- Complaint upheld;
- Complaint partially upheld; or
- Complaint not upheld.

The response will normally include:

- A summary of the issues investigated;
- Findings;
- Any remedial actions taken or proposed;
- Information regarding lessons learned; and
- ;Details of further escalation options.

9.5 Where a complaint identifies a breach or compliance failure, the organisation may take appropriate corrective action, including:

- Rectification, erasure or restriction of personal data;
- Process improvements;
- Staff training;
- Policy amendments;
- Technical or organisational security improvements; or
- Any other measures considered necessary.

9.6 If the complainant remains dissatisfied with the outcome, they may contact the Information Commissioner's Office (ICO).

Details of the ICO are available at:

<https://ico.org.uk>

The organisation encourages individuals to allow it an opportunity to investigate and respond to concerns before escalating the matter externally.

## 10 Cookies

### 10.1 Introduction

10.1.1 Our website uses analytics cookies to analyse site traffic and improve the user experience

10.1.2 We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website

10.1.3 No cookies will be set until your approval is given

### 10.2 About cookies

10.2.1 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

10.2.2 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

10.2.3 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

10.2.4 Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website

### 10.3 Our cookies

#### 10.3.1 We use persistent cookies on our website

10.3.2 If you allow cookies to be stored for this site, a cookie called 'pva-cookie-consent' will be set to store your preference. In addition, Google Analytics cookies will also be set as described below

### 10.4 Analytics cookies

#### 10.4.1 We use Google Analytics to analyse the use of our website

10.4.2 Our analytics service provider generates statistical and other information about website use by means of cookies

10.4.4 The information generated relating to our website is used to create reports about the use of our website

10.4.5 Our analytics service provider's privacy policy is available at:  
<http://www.google.com/policies/privacy/>

### 10.5 Third party cookies

#### 10.5.1 Our website does not use third party cookies

### 10.6 Blocking cookies

10.6.1 Most browsers allow you to refuse to accept cookies; for example:

(a) in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced"

(b) in Firefox (version 47) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"

(c) in Chrome (version 52), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading

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

### 10.7 Deleting cookies

10.7.1 You can delete cookies already stored on your computer; for example:

(a) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>)

(b) in Firefox (version 47), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"

(c) in Chrome (version 52), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data",

and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data"

10.7.2 Deleting cookies will have a negative impact on the usability of many websites

## 10.8 Cookie preferences

10.8.1 You can manage your preferences relating to the use of cookies on our website by changing the setting at the top of this page.

## 11 Our details

11.1 This website is owned and operated by **Private Personal Assistant**.

11.3 You can contact us by email, using **[anna@privatepersonalassistant.co.uk](mailto:anna@privatepersonalassistant.co.uk)**

## 12 Data protection officer

12.1 Our data protection officer's contact details are:  
**[anna@privatepersonalassistant.co.uk](mailto:anna@privatepersonalassistant.co.uk)**