

Privacy policy

Section 1: Introduction

Section 1.1

1.1 In this policy, "we", "us" and "our" refer to Samantha Lee. [For more information about us, see Section 9.]

1.2 "Personal data" is defined in Article 4(1) of the GDPR:

"(1) 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

Section 2: Credit

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

Section 3: How we use your personal data

3.1 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].

3.2 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]] OR *[specify basis]*.

3.3 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] OR [the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract] OR *[specify basis]*.

3.4 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]].

- 3.5 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 [consent] OR [our legitimate interests, namely [the proper administration of our website and business]] OR [the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract]
- 3.6 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 or your employer].] 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 [consent] OR [our legitimate interests, namely [the proper administration of our website and business]] OR [the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract]
- 3.7 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 [consent] OR [our legitimate interests, namely [monitoring and improving our website and services]]

Section 4: Providing your personal data to others

Article 13(1)(e) of the GDPR requires that where personal data are collected from the data subject, the data controller must provide the data subject with information about "the recipients or categories of recipients of the personal data".

Equivalent rules for data collected from someone other than the data subject are in Article 14(1)(e).

- 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.
- 4.3 We may disclose name, physical address, email address to [our suppliers or subcontractors insofar as reasonably necessary for to complete transactions.

- 4.4 Financial transactions relating to [our website and services] [are] OR [may be] handled by our payment services providers, Amazon, Smashwords, Gnaaxy, Paypal, Draft 2 Digital. 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].
- 4.6 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.]

Section 5: Retaining and deleting personal data

- 5.1 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.

Section 6: Amendments

6. Amendments

- 6.1 We may update this policy from time to time by publishing a new version on our website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 6.3 We may notify you of changes to this policy [by email or through the private messaging system on our website].

Section 7: Your rights

Section 7.1

- 7.1 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)].
- 7.2 We may withhold personal information that you request to the extent permitted by law.
- 7.3 You may instruct us at any time not to process your personal information for marketing purposes.

7.4 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.

Section 8: Cookies used by our service providers

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

8.2 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/>.

Section 9: Our details

9. Our details

9.1 This website is owned and operated by Samantha Lee or authorized designee.

9.4 You can contact us:

- (a) using our website contact form