

# Privacy Policy

By accessing our Site or our Service, you accept our Privacy Policy and Terms of Use (found above), and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy.

## INFORMATION WE COLLECT

Fawcett VA Services Ltd collects “Non-Personal Information” and “Personal Information” in the categories described below.

### *Usage data*

Fawcett VA Services Ltd will process information about your use of our website and services (“usage data”). The usage data may include

- (1) The browser types and versions used
- (2) The operating system used by the accessing system
- (3) The website from which an accessing system reaches our website (so-called referrers)
- (4) The sub-websites
- (5) The date and time (so-called timestamp) of access to the Internet site
- (6) An Internet protocol address (IP address)
- (7) The internet service provider (ISP) of the accessing system
- (8) The geographical location of the user
- (9) The page views and site navigation path
- (10) The pattern of the user’s use of the service with regards to timing and frequency
- (11) Any other similar data and information that may be used in the event of attacks on our information technology systems.

The source of the usage data is Google Analytics. We use Google Analytics software to collect information about how you use our site. We do this to help make sure the site is meeting the needs of its users and to help us make improvements, for example improving site search. The usage data collected is needed to:

- (1) deliver the content of our website correctly
- (2) optimise the content of our website as well as any advertisement
- (3) ensure the long-term viability of our information technology systems and website technology
- (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

Google Analytics stores information about:

- The pages you visit
- How long you spend on each page
- How you got to the site
- What you click on while you're visiting the site

We don't collect or store your personal information (for example your name or address) so this information can't be used to identify who you are and we don't allow Google to use or share our analytics data.

You can [opt out of Google Analytics cookies](#).

In order to process this information, we have obtained the user's consent in the interest of monitoring and improving our website and services.

#### *Notification data*

Fawcett VA Services Ltd may process information that you provide for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). Our newsletter may only be received by the user if:

- (1) the user has a valid email address and
- (2) the user registers for the newsletter shipping.

A confirmation email will be sent to the email address registered by a user for the first time for newsletter shipping, for legal reasons, in a double opt-in procedure. The confirmation email is used to prove whether the owner of the email address as the user is authorised to receive the newsletter.

When the user registers for the newsletter, we also store the IP address of the computer system assigned by the internet service provider (ISP) and used by the user at the time of the registration, as well as the date and time of the registration.

The purpose of the collection of this data is to legally protect Fawcett VA Services Ltd by ensuring an understanding of the possible misuse of the email address of a user at a later date. The personal information collected as part of a registration for the newsletter will only be used to send our newsletter.

The subscription to the newsletter may be terminated by the user at any time. The consent to the storage of personal data, which the user has given prior to the shipping of the newsletter, may be revoked at any time. For the purpose of revoking consent, a corresponding link for unsubscribing is found in each newsletter.

#### *Enquiry data, correspondence data, and customer relationship data*

Fawcett VA Services Ltd 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, the personal information transmitted by the user is automatically stored.

The personal information may include:

- (1) the user's contact information
- (2) the user's name
- (3) the name of the user's employer
- (4) the user's job title or role
- (5) the metadata associated with the communication
- (6) and information contained in communications between the user and Fawcett VA Services Ltd

Such personal data transmitted on a voluntary basis by a user to Fawcett VA Services Ltd 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.

#### *Publication data*

Fawcett VA Services Ltd may process information that the users post for publication on our website or through our services ("publication data"). On our website, users can post information in the following ways:

##### *Comments on blog posts*

When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection.

An anonymised string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. [The Gravatar service Privacy Policy is available here](#). After approval of your comment, your profile picture is visible to the public in the context of your comment.

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.

#### *Embedded content from other websites*

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

#### *Transaction data*

Fawcett VA Services Ltd may process information that relates to transactions, including purchases of goods and services, that the user enters into with us and/or through our website ("transaction data"). The transaction data may include:

- (1) the user's contact details
- (2) the user's bank card details
- (3) the transaction details with regard to the purchase

In order to process the transactions on our website, we use the following third-party payment service provider PayPal. We do not store or process your card details ourselves, they are processed and stored via one of these contracted third-party service providers.

We encrypt your payment card details in your browser and securely transfer this data to our relevant third-party payment provider to process a payment.

We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding your payments and dealing with queries relating to your payments and refunds.

You can see details of how your data is processed by Stripe here in their [privacy policy](#). You can view [PayPal's privacy policy](#) here.

## **HOW WE USE AND SHARE INFORMATION**

### *Personal Information*

Except as otherwise stated in this Privacy Policy, we do not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties without your consent.

We do share Personal Information with vendors who are performing services for the Company, such as the servers for our email communications who are provided access to the user's email address for purposes of sending emails from us.

Those vendors use your Personal Information only at our direction and in accordance with our Privacy Policy.

In general, the Personal Information you provide to us is used to help us communicate with you. For example, we use Personal Information to contact users in response to questions, solicit feedback from users, provide technical support, and inform users about promotional offers.

### *Non-Personal Information*

In general, we use Non-Personal Information to help us improve the Service and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyse use patterns on the Site.

This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion.

### *Legal purpose of the processing of personal data*

Fawcett VA Services Ltd may process any of your personal information identified in this privacy policy where necessary for the establishment, exercise or defence of legal claims, both in court proceedings and in an administrative or out-of-court procedure.

The legal basis for this processing is the protection and assertion of our legal rights, your legal rights and the legal rights of others.

Fawcett VA Services Ltd may also process any of your personal information identified in this privacy policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, fulfilment of tax obligations, or obtaining professional advice. The legal basis for processing is the proper protection of our business against risks.

## **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.

## **RETAINING AND DELETING YOUR PERSONAL INFORMATION**

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.

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.

## **We will retain your personal data as follows:**

- Email addresses will be retained until you manually request to be removed from our mailing list. This data is 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.
- IP addresses will be retained for a minimum period of 30 days and for a maximum period of 14 months. This data is stored to help us improve the Service, customise the user experience and make informed business decisions.

## **YOUR DATA PROTECTION RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)**

If you are a resident of the EEA, you have the following data protection rights:

- If you wish to access, correct, update, or request deletion of your personal information, you can do so at any time by emailing [hello@vaninjas.co.uk](mailto:hello@vaninjas.co.uk)
- In addition, you can object to the processing of your personal information, ask us to restrict the processing of your personal information or request portability of your personal information.
- You have the right to opt out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails we send you. To opt out of other forms of marketing, please contact us by emailing [hello@vaninjas.co.uk](mailto:hello@vaninjas.co.uk)
- Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## **LINKS TO OTHER WEBSITES**

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain.

This Privacy Policy applies solely to information collected by us through the Site and the Service. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link on our Site or via our Service.

To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application.

We encourage our users to read the privacy statements of other websites before proceeding to use them.

## **UPDATES**

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of significant changes to this policy by email or by placing a prominent notice on our site. Significant changes will go into effect 30 days following such notification.

Non-material changes or clarifications will take effect immediately. You should periodically check the Site and this privacy page for updates.