

## Sphere Data Protection Privacy Notice

Hello, and thanks for stopping by, we appreciate you taking the time to look at our legal policy notice. We know that, although it's important to inform you properly, you really don't want to be bored to tears wading through it, so we will keep it as brief as possible.

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### Summary

This Policy details our commitment to protecting the privacy of individuals who engage with us, either as clients and prospective clients interested in our services, people who send us contact messages and enquiries via our web contact forms, those who trade and work with us as suppliers and affiliates, and all the lovely likeminded and eager people we meet at networking and industry events who are happy to swap their business cards.

### A little bit about us

Sphere Data Protection Limited is small consulting firm in Hertfordshire, created with a specific aim of supporting owners of micro, small and medium businesses with easy to understand and practical data protection guidance and advice.

We are registered in England and Wales under company number 11034070 at 16 Hawthorn Way, St Albans, Hertfordshire AL2 3BQ. You can contact the Director, Kim Bradford, via 01727 375078 or [info@spheredataprotection.com](mailto:info@spheredataprotection.com).

### Your rights

You can exercise certain rights regarding the personal data we process as follows:

- **Withdraw your consent at any time.** You have the right to withdraw consent where you have previously given consent to the processing;
- **Object to processing of your data.** You have the right to object to the processing of your data if the processing is carried out on a lawful basis other than consent. Further details are provided in the dedicated section below.
- **Access to your data.** You have the right to know what data is being processed by us and ask for a copy of it.
- **Ask for your data to be updated.** Whilst we take all measures to ensure we have accurate and up to date information, you have the right to verify the accuracy and ask for it to be updated or corrected.
- **Restrict processing.** You have the right, under certain circumstances, to restrict the processing we perform with your data.

- **Have your data deleted.** You have the right, under certain circumstances, to ask us to delete your personal data, if it appears that we process it outside of any legal or legitimate reasons.
- **Lodge a complaint.** You have the right to bring a claim about how we process your personal data to the relevant data protection authority, which in the UK is the Information Commissioner's Office (ICO).

#### **Further details about...**

- **Your right to object to processing.** Where we process your personal data for reasons of public interest, in exercising an official authority vested in us, or for the purposes of our legitimate interests, you can object to this processing by providing a us with situational grounds to justify the objection. You can, however, object to our processing of your personal data for direct marketing purposes at any time without providing any such justification.
- **Your right to port your data to another controller.** Where applicable, and provided that the data is processed by automated means based on your consent for performance of contractual obligations, you have the right to have your data ported. To assist with this, we will provide you with a copy of the relevant data in a structured, commonly used and machine-readable format if possible, to assist you in transmitting it to another controller.

#### **How to exercise these rights, including subject access requests**

You can direct any requests to exercise your rights to the Director through the contact details outlined above, preferably in writing to ensure we can attend to your request promptly. Please include the following information with any request:

- Full Name
- Email Address
- Billing Address
- Details of any specific information you require, and/or any relevant dates

To protect your privacy, we will ask for further information to identify you and ensure the personal data relates to the individual making the request. We will respond within one month of receiving the information we require to carry out your request.

#### **What personal data we process**

As a consulting business we process personal data for clients, potential clients and suppliers – this includes directly processing names, job titles, email addresses, phone and mobile numbers, registered business addresses, and invoicing payment details, and indirectly processing some special category information, such as gender for salutation title.

#### **Methods of processing**

We take all appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of personal data, in all its formats. We employ robust data security methods for all software and hardware, regardless of location of work in our own and other premises, and never use open wi-fi or broadband services that may represent risks to the data we process.

Data processing is carried out manually (notes taken) and using computers and/or IT enabled tools, and only in relation to the purposes indicated in the course of running the business and interacting with clients and suppliers.

In some cases, your data will be accessible to the Web Designer and Host for the website (We Get Digital), by Associates (professional freelance consultants, virtual administration assistants etc.) and by third party service providers involved with our business operations (Really Simple Systems, Xero accounting software, Eventbrite, LinkedIn, Twitter, Mailjet, Jottacloud, Google Calendar, and Microsoft Outlook), and payment transaction providers (PayPal, Lloyds Bank and other banks as used by clients and suppliers) who operate as Data Processors on our behalf. This list of these parties is updated from time to time and can be requested from the Director at any time.

### **Lawful basis for processing**

Our processing of your personal information is necessary for the following reasons:

- for the performance of contracts with clients, associates and suppliers, and to take steps to entering into such contracts;
- for the purposes of legitimate interests pursued by us; or
- to comply with a legal obligation to which we are subject.

### **Legitimate interests**

Where our processing of personal data is based on the legitimate interest grounds described above, those legitimate interests are:

- collecting personal information to provide you with a smooth and efficient customer experience;
- running our business;
- to provide the services you have requested;
- to prevent fraud

We will maintain contact with all our current and previous clients by phone and email to check in on their data protection and compliance progress and activities, see if they have additional or new requirements, and to advise them about new courses or services we are offering – we believe that this ongoing relationship management falls within legitimate interests of the parties involved.

Should any client wish to bring the relationship to a close we will honour this, and retain only the information required by law, in line with the section in this notice on retention. In any case, we will gladly help clarify the specific lawful basis that applies to any of our personal data processing activities.

### **Marketing**

We do not buy in external data lists for marketing or cold calling. All current and potential clients whom we engage with have the option at any time to ask us to stop contacting them or restrict processing of their details for any kind of marketing or promotional purposes.

You can stop receiving marketing emails from us at any time, by speaking informally with a member of the team or by contacting the Director through the contact details outlined above. Once you do this, we will update our records to ensure that you don't receive further marketing messages.

Stopping marketing messages will not stop service communications such as terms of service changes, policy updates and other essential communications, particularly if we are in the process of providing a service to you at that time.

### **Sharing information with third parties**

Except as expressly set out in this notice we will not share your personal information with third parties unless we have your permission, or if we are required by law to do so.

We will share your information with the following categories of companies as an essential part of being able to provide our services to you, as set out in this Privacy Notice:

- Contractors engaged as Associates by Sphere Data Protection Limited who provide services to you;
- Companies that help us fulfil our services to you e.g.: virtual administration providers, CPD certifications, payment processors and banks;
- Professional service providers, such as IT, database software providers, email and website hosts who help us run our business;
- Our accountant, so that we can carry out our company accounting requirements to HMRC.

We will also share your personal information if ever required under law with:

- law enforcement agencies, public authorities, other governmental agencies or third parties if we are mandated by law to do so, or to establish, exercise or defend legal claims or court proceedings.

### **Transfer of information overseas**

The information that we collect from you will only be transferred to, and stored at, a destination outside the European Economic Area ("EEA") in instances where the data processing is handled by a service provider, client or third party with headquarters overseas; this could include companies in the United States.

When we, or our permitted third parties, transfer your information outside the EEA, we/they will impose obligations on the recipients of that data to protect your information to the standard required in the EEA, or otherwise require the recipient to subscribe to international frameworks intended to enable secure data sharing. For transfers of data we make, we will put in place appropriate safeguards to ensure that your information remains adequately protected.

For transfers to the United States we will always conduct due diligence to ensure that these businesses subscribe to the US-EU Privacy Shield regulations. If you would like more details about the safeguards that we rely on, please contact our Director.

To find out more about the place of processing of such transferred Data, please can check the section containing details about our service providers and third party data processors or inquire with the Director using the information provided in the contact section.

### **Retention time**

We only process and store your personal data for as long as required for a necessary purpose:

- Collected for purposes related to the performance of a contract between Sphere Data Protection and our clients or suppliers until the contract has reached its end, through completion, expiry or termination;
- Retained for legal reasons, such as for tax reporting or to ensure deleted or restricted processing requests are honoured and maintained;

- In line with our legal and legitimate interests as outlined in the relevant sections of this document or by contacting the Director.

We might retain personal data for a longer period if appropriate consent to such processing has been given (until it is no longer applicable or has been withdrawn), or if required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, we will delete personal data from our records. We only keep our client records for a period of 12 months after last meaningful contact, in case they return to us during this timeframe.

Former clients and prospects are always very welcome to get back in touch with us at any time, and often do so, but should note that we may not have any records of previous conversations if the retention period has passed; therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after the retention period.

### **Cookies**

Our website collects some personal data from visitors. Yep, you read that right – fortunately we don't use a lot of cookies (bad for the waistline as well as privacy) so there's a list of them below along with some information about their purposes. Personal data can be freely provided by our visitors, but unless they become a client we will not keep their details on record. In the case of Usage Data, this is collected automatically when using our Website, depending on individual's browser security settings.

### **System logs and maintenance**

For operation and maintenance purposes, our website and any third-party services collect files that record interaction with the website via system logs and other personal data, such as IP addresses, for this purpose.

### **How “Do Not Track” requests are handled**

Our website is a simple one and doesn't support “Do Not Track” requests. To determine whether any of the third-party services it uses honour the “Do Not Track” requests, we suggest you visit or read their privacy policies.

### **Selling goods and services online (our document toolkits)**

Personal data collected by PayPal is used to facilitate payment via subscription accounts and visitor transactions (which can be sourced by various funding streams set up by PayPal users), but this website does not store or record any information relating to PayPal accounts or payment methods.

### **Handling payments**

Payment processing services enable our website to process payments by credit card, bank transfer or other means. To ensure greater security, this website shares only the information necessary to execute the transaction with the financial intermediaries handling the transactions and doesn't store or retain any of this information. Some of these services also enable the sending of timed messages, such as emails containing invoices or notifications concerning the payment.

### **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of our website. The interaction and information obtained through this website are always

subject to the user's privacy settings for each social network. This type of service might still collect traffic data for the pages where the service is installed, even when users do not use it.

### **Changes to this privacy notice**

We reserve the right to make changes to this privacy notice at any time by giving notice to our clients, suppliers and trading partners on this page, within our website, or (if technically or legally possible) by sending a notice using any available contact information.

To stay informed of changes we recommended you therefore check this page from time to time, referring to the date of the last modification listed at the foot of this notice.

Should any changes affect processing activities carried out based on your consent, we will ensure that we collect new consent from you beforehand, wherever required.

## Our service providers and third party data processors

See below a list of our current service providers and third party data processors:

Provider	Application	HQ / Data Sharing Location	Personal Data Collected	Description
<a href="#">Google Inc.</a>	Google Analytics	USA <a href="#">Privacy Policy</a> - <a href="#">Opt Out</a>	Cookies and usage data	Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilises the data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualise and personalise the ads of its own advertising network.
<a href="#">Google Inc.</a>	Google Analytics with Anonymised IP	USA <a href="#">Privacy Policy</a> – <a href="#">Opt Out</a>	Cookies and usage data	Google Analytics is a web analysis service provided by Google Inc. Google utilises the data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualise and personalise the ads of its own advertising network. This integration of Google Analytics anonymises your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.
<a href="#">Google Inc.</a>	Google reCAPTCHA	USA <a href="#">Privacy Policy</a> Privacy Shield participant	Cookies and usage data	This type of service analyses the traffic of this Website, potentially containing users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM. Google reCAPTCHA is a SPAM protection service provided by Google Inc. The use of reCAPTCHA is subject to the Google <a href="#">privacy policy</a> and <a href="#">terms of use</a> .
<a href="#">Google Inc.</a>	Google Calendar widget	USA <a href="#">Privacy Policy</a>	Cookies and usage data	Google Calendar widget is a calendar content visualization service provided by Google Inc. that allows this Website to incorporate content of this kind on its pages.
<a href="#">Google Inc.</a>	Google+ +1 button and social widgets	USA <a href="#">Privacy Policy</a>	Cookies and usage data	The Google+ +1 button and social widgets are services allowing interaction with the Google+ social network provided by Google Inc.
PayPal Inc.	PayPal, and PayPal Carrier Payments	USA and various <a href="#">Privacy Policy</a>	Phone number and various types of data as specified in the service privacy policy	PayPal is a payment service provided by PayPal Inc. which allows users to make online payments. PayPal Carrier Payments is a payment service provided by PayPal Inc. which allows users to make online payments using their mobile phone operator.
PayPal Inc.	PayPal button and widgets	USA and various <a href="#">Privacy Policy</a>	Cookies and usage data	The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.
Microsoft Inc.	Office 365	USA <a href="#">Privacy Policy</a>	Various, limited to service and fault management	We use the Microsoft Office 365 platform for office data management, including Microsoft Outlook as our email management system.
Lloyds Bank Plc	Business Banking Services	UK <a href="#">Privacy Policy</a>	Financial and contact data for business entities and owners	We bank with Lloyds Bank Plc, who will process financial and transactional data on our behalf, to the limits of requirement for such transactions, and to meet legal requirements e.g. for anti-fraud and money laundering legislation.
Really Simple Systems Ltd	Customer Relationship Management	UK <a href="#">Privacy Policy</a>	Customer contact details, links to invoicing system, links to email platform	We use a CRM database from Really Simple Systems to manage all our client records, this links to our accounting system (Xero) and our email platform (Outlook). We operate a strict retention policy, see the relevant section in this notice for more information on retention.

Provider	Application	HQ / Data Sharing Location	Personal Data Collected	Description
Mailjet	Mail campaign management	France <a href="#">Privacy Policy</a>	Email addresses and first names or salutations	For our occasional email campaigns and newsletter distribution we use a third party mail management company called Mailjet, who are based in the EU.
Jottacloud	Online backup file service	Norway <a href="#">Privacy Policy</a>	Sphere account user profile, file system metadata, no access to file contents	We use a secure server and file transfer system provided by Jottacloud, which is an EEA based company, to securely share large files and client documents. Files are encrypted using secure socket layer (SSL) during transfer.
Xero	Accounting software	UK, USA and New Zealand <a href="#">Privacy Policy</a>	Sphere account user profile, client contact information for invoicing / tax reporting	For all our online accounting we use Xero software. The only people with access to this software user profile is the Director and our Chartered Accountant, Gilberts.
Gilberts	Chartered Accountants	UK <a href="#">Privacy Policy</a>	Accounting software access	Our chartered accounting services are provided by Gilberts, a local accountancy firm.
Eventbrite	Event management, advertising and booking system	USA <a href="#">Privacy Policy</a>	Sphere account user profile, client booking info: name, company, email address	For our training events we advertise via Eventbrite – customers booking via Eventbrite are required to enter minimal information for their booking, and the site may also capture additional information depending on your payment method (e.g. PayPal) or whether you have your own Eventbrite user account.
Twitter Inc.	Tweet button and social widgets	USA <a href="#">Privacy Policy</a>	Account, profile and contact information, cookies and usage data	The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter Inc.
LinkedIn Corporation	LinkedIn button and social widgets	USA <a href="#">Privacy Policy</a>	Account, profile and contact information, cookies and usage data	The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.
JAW Consulting UK	Business Affiliate	UK <a href="#">Privacy Policy</a>	Name, email address, company, phone number	Our business affiliate JAW Consulting have an agreement for lead sharing and client referrals – only basic details provided by potential clients for service enquiries are shared between us, and we uphold a strict data sharing and information privacy agreement.
We Get Digital	Web design and hosting, SEO	UK <a href="#">Privacy Policy</a>	Sphere team user profiles	Our web design and hosting, and SEO services, are provided by We Get Digital, a local UK company whose servers and backups are all UK based. Access to client data is very limited, as our website does not retain information for any of our clients and enquirers.
Contact form	This website	UK	Name (required), email address (required) and free text fields	By filling in the contact form with their data, Users authorise this Website to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.
Mailing List or Newsletter Subscription	This website	UK	First name (required), email address (required)	By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning Sphere Data Protection Limited.
Displaying content from external platforms	This website	UK, various depending on external platform host locations	Web traffic data	This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them. This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

## Jargon busting

Just to ensure we aren't using too many legalese terms, here's a list of definitions for clarity:

- **Personal data (or just data, where we list that term).** Any information that directly, indirectly, or in connection with other information allows for the identification or identifiability of a natural person. This includes personal identification numbers and IP addresses.
- **Usage data.** Information collected automatically through this website (or third-party services employed in this website), which can (but doesn't always, depending on your browser privacy settings) include some or all of the following:
  - the IP addresses or domain names of the computers of people who access this website (you);
  - the URI addresses (Uniform Resource Identifier), time of the request, the method utilised to submit the request to the server, and the size of the file received in response;
  - the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system you use;
  - the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within that website, with special reference to the sequence of pages visited; and
  - other parameters about the device operating system and/or your IT environment.
- **User.** This means you! Or, in other words, the individual using or visiting our website who, unless otherwise specified, coincides with the data subject.
- **Data subject.** Again, you! Or, to be specific, the natural person to whom the personal data refers.
- **Data processor.** The natural or legal person, entity, public authority, agency or other body which processes personal data on behalf of the controller, as described in this privacy notice.
- **Data controller.** The natural or legal person, entity, public authority, agency or other body which, alone or jointly with others, decides the purposes and means of the personal data processing, including the security measures concerning the operation and use of our website. The data controller, unless otherwise specified, is Sphere Data Protection Limited, the owner of this website.
- **This website.** This website, and the means by which some of your personal data is collected and processed.
- **Service.** The service provided by our website as described in the relative terms (if available) and on this site.
- **European Union (or EU).** Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.
- **Cookies.** Small piece of data stored in the User's device.

- **Analytics:**
  - **Google Analytics and Google Analytics with anonymized IP.** Personal Data: Cookies and Usage Data.
- **Contacting the User:**
  - **Contact form.** personal data: name, email address, and any other personal or contact information entered into the free text field by users/data subjects.
  - **Mailing list or newsletter.** Personal data: email address and first name.
- **Displaying content from external platforms:**
  - **Google Calendar widget.** Personal data: cookies and usage data.
- **Handling payments:**
  - **PayPal.** Personal data: various types of data as specified in the privacy notice of the service.
  - **PayPal Carrier Payments.** Personal data: phone number and various types of data as specified in our privacy notice.
- **Interaction with external social networks and platforms:**
  - **LinkedIn button and social widgets, PayPal button and widgets, Twitter Tweet button and social widgets and Google+ +1 button and social widgets.** Personal data: cookies and usage data.
- **SPAM protection:**
  - **Google reCAPTCHA.** Personal data: cookies and usage data.

### Privacy notice updates table

Any changes we make to our Privacy Notice in the future will be posted on this page and, where appropriate, notified to you on our website or via other means (e.g. via service updates, newsletters, email signature notices etc). Please check back frequently to see any updates or changes to our notice.

This Privacy Notice was last updated on:

Date	Action	By
16/12/2017	First Draft	Kim Bradford
02/02/2018	Amended service providers section	Kim Bradford
31/05/2018	Amended text following review	Kim Bradford

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### Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Articles 13 and 14 of Regulation (EU) 2016/679 (General Data Protection Regulation). This privacy notice relates solely to Sphere Data Protection Limited's business operations and this website.