# **Privacy Notice**

#### I. Values

Just So Speaking Limited is the data controller and we are responsible for your personal information (referred to as "we", "us" or "our" in this privacy notice).

Thank you for trusting us with some information about you. We take that trust seriously and we want you to know how we use your information and why.

By providing us with your information, you warrant to us that you are over 13 years of age.

#### 2. Who are we?

This website – <a href="https://www.justsospeaking.com">www.justsospeaking.com</a> – is operated by Just So Speaking Limited. We are a private limited company registered in England & Wales with the registered number 11241559.

If you have any queries about how we use your information, or comments or questions about this privacy notice, please email us at <a href="mailto:privacy@justsospeaking.com">privacy@justsospeaking.com</a>.

#### 3. What personal information do we collect?

We gather and use certain information about individuals, in order to offer services and products that may be of interest to visitors to our website. We also collect information to better understand how visitors use this website and to present timely, relevant information to them.

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics that you provide to us via the Contact form (e.g. name; email address)
- Website usage data (e.g. your IP address; the date, time and duration of your visit; information about which pages of the website you have viewed)
- Other information relevant to client enquiries

We do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

## 4. How do we use your personal information?

Most of the personal information we process is provided to us directly by you when you decide to interact with us. We only collect the information necessary to carry out our business. Specifically, we may use personal information:

- For our own internal records
- To improve the services and products we provide
- To contact you in response to a specific enquiry
- To customise the website for you

- To send you promotional emails about services, products, offers and other items we think might be relevant to you
- To contact you via email or telephone for market research reasons

We do not sell or exchange your personal information with third party organisations who may want to sell you something or use your data for research or other purposes. We may share your personal information with our outsourced support team (e.g. accountants, business assistants, web designers) in order for them to provide services to us or on our behalf. We do not authorise these service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information include:

- Your consent You have consented to the use of your personal information in a particular way. When you consent, you can change your mind at any time.
- We have a contractual obligation We need your personal information to provide you with services
  and products requested by you, or to respond to your enquiries. In other words, so we can perform
  our contract with you or take steps at your request before entering into one.
- We have a legal obligation We have a legal obligation to use your personal information, such as to comply with applicable tax and other government regulations or to comply with a court order or binding law enforcement request.
- We have a legitimate interest We have a legitimate interest in using your personal information, for example: as a provider of services and products we collect information to seek potential clients similar to those we already serve for marketing purposes; we process information to keep a record of your relationship with us; we compile statistical data on the use of our website to enable us to evaluate and improve our site.

#### 5. How do we store your personal information?

Like most small businesses, we do not have any tailor-made software; we use mainstream packages for everything from our client records, to email, to accounting.

This means that some of your data may be held in the EEA and some may be held in services in the USA or elsewhere. We have picked mainstream suppliers with appropriate security standards.

We will retain your personal information for no longer than reasonably necessary to fulfil the purposes outlined in this privacy notice unless a longer retention period is required or permitted by law. We will not keep more information than we need for those purposes. For further information about how long we will keep your personal information, please email <a href="mailto:privacy@justsospeaking.com">privacy@justsospeaking.com</a>.

### 6. Your data protection rights

Under data protection law, you have rights including:

- Access You have the right to ask us for copies of your personal information.
- Rectification You have the right to ask us to rectify personal information you think is inaccurate or incomplete.
- Erasure You have the right to ask us to erase your personal information in certain circumstances.
- Object to processing You have the right to object to the processing of your personal information in certain circumstances.

You can see more about these rights at: <a href="https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/">https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/</a>

You are not required to pay any charge for exercising your rights, however we may charge a reasonable fee if we think your request is excessive, to help us cover the costs of locating the information you have requested.

If you make a request, we have one month to respond to you. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Please contact us at <a href="mailto:privacy@justsospeaking.com">privacy@justsospeaking.com</a> if you wish to make a request.

## 7. How to complain

If you have any concerns about our use of your personal information, please contact us in the first instance at <a href="mailto:privacy@justsospeaking.com">privacy@justsospeaking.com</a> so that we can try to resolve your complaint for you.

If we cannot resolve your complaint, you can contact the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues: <a href="https://www.ico.org.uk">www.ico.org.uk</a>.

## 8. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. Always be wary when submitting data to websites and read the website's privacy notices in full.

### 9. Cookies

Cookies are small pieces of text sent to your browser when you visit a website. This website collects personal information to power our site analytics, including: information about your browser, network and device; web pages you visited prior to coming to this website; your IP address. This information may also include details about your use of this website, including clicks, internal links, pages visited, scrolling and timestamps.

Our website analytics provider, Squarespace, collects data for us using cookies and similar technologies. For more information about the cookies Squarespace uses <u>click here</u>. Certain functional and required cookies are always used as they allow Squarespace, our hosting platform, to securely serve this website for you. We also use analytics and performance cookies (only when you acknowledge our cookie banner) to understand how you interact with our website, allowing us to improve the website structure, design, content and functionality.

You can set your browser to refuse some or all cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of our website may become inaccessible or not function properly.

## 10. Changes to this privacy notice

We keep this privacy notice under regular review, and it may be updated from time to time. It was last updated in April 2023.