



**PRIVACY NOTICE and DATA PROTECTION POLICY (combined)**

Updated on 23/05/2018 by Jane Williams, Proprietor and Data Controller

Next Review Date: May annually

Jane Williams is a registered Data Controller with the Information Commissioner's Office under registration reference: ZA338727.

**Why is this policy important?**

This policy ensures that:

- (a) I protect the rights of my clients, people who contact me, business contacts and other individuals or businesses I may need to contact to carry out my work.
- (b) I comply with data protection law and that I follow good practice.
- (c) It protects me and clients from the risks of a data breach.

**Nature of my work**

- (a) Computer training (ICT) in the client's home or office, and tuition on other devices.
- (b) maintain and update client websites, and the renewal of hosting and domain names.

**Who is the Data Controller?**

The Proprietor Jane Williams is the Data Controller and is, therefore, responsible for controlling why data is collected, how it will be used, and how it will be safely stored. Any questions relating to the collection or use of data should be directed to the Data Controller.

**Fair and lawful processing of personal data**

I only collect and use personal data for specified and lawful purposes, and only where it is necessary for the legitimate purpose of my business.

I will never pass on personal data to third parties without the explicit consent of the subject.

I ensure that any data collected is relevant and not excessive.

**I DO NOT SHARE CLIENT INFORMATION WITH THIRD PARTIES.**

**Description of processing**

The following is a broad description of the way I process personal information. To understand how your own personal information is processed you may need to refer to any personal communications you have received from me, check this privacy notice on my website or contact me to ask about your personal circumstances. See 'What information do I ask for?' below.

**Reasons/purposes for processing information**

I process personal information to enable me to provide home tuition to private clients, tuition to staff members in a client company, to promote my services, maintain and update my website, maintain and update client websites, domain names and hosting packages, and to maintain my accounts and records.

**Type/classes of information processed**

I process information relevant to the above reasons/purposes. This information may include:

- a) personal details – name, postal address including postcode, telephone numbers, email address(es), website URL, how you heard about me, directions to your property
- b) goods and services that I have supplied
- c) your employment details so that I may supply the appropriate training.

### **I also process sensitive classes of information that may include:**

- a) physical or mental health details when this is relevant to the services I offer.

### **I process data in accordance with individuals' rights**

The following requests can be made in writing (email or post) to the Data Controller, and they will be actioned within 30 days of the request being received:

- a) to see any data stored about them
- b) to have any inaccurate data held about them updated
- c) to stop receiving any communication that is not essential for me to carry out work for them.
- d) to object to any storage or use of their data.

I process personal information about (a) my clients (b) people who have made an enquiry (c) clients' websites, hosting and domains.

### **Withdrawing your data**

If you wish to withdraw your consent, check the data I hold on you, have your data removed, or need any further information, please email The Data Controller, Jane Williams at [jane@janewilliams.com](mailto:jane@janewilliams.com) or write to: Mrs J Williams, 5 Streamside Walk, Aylesbury, Bucks. HP21 8NU.

I will comply at my earliest opportunity or at most within 30 days.

### **How will information about you be used?**

The information you supply will only be used in relation to your enquiry and appointments. I will never use your data for any purpose other than that stated above or that can be considered reasonably related to it. For example, I will never pass on personal data to third parties without your explicit consent.

### **What information do I ask for?**

(a) When you make an enquiry I will ask you for:

- your name, and if applicable company name so that if you contact me again I can refer to the previous conversation notes.
- your town or village so that I may quote my fees
- the nature of your enquiry – how can I help you?
- how did you hear about me?
- if your enquiry was via email then I may use your email address to reply
- if your enquiry was via my website then I ask for your email address and your daytime and evening telephone numbers so that I may contact you in relation to your enquiry.

I will keep a record of your enquiry (either a handwritten note or email(s) which will be helpful if/when you make a booking. This information will be kept for approx. one year.

Your contact details are only used in connection with your enquiry and/or appointment(s).

(b) When you make an appointment I complete a handwritten Booking Form which I then bring with me to your appointment. In addition to the above I will ask you for:

- your full address including postcode
- any directions to your property that may be helpful
- your telephone numbers (landline and mobile if possible/agreeable) so that I may contact you if there is any change to your appointment, or if there is no reply at your door when I arrive
- your email address - this may be used in connection with your appointment(s) and, if you have opted in, to promote my services, and/or to send a seasonal ecard.
- I may record which tuition courses (subjects) and/or goods I have supplied.

(c) After a training session for a company/corporate client I may request that delegates complete a Feedback Form rating various aspects of the training session. On this form there is a tick/check box stating that comments contained therein may/may not be used in promotional material and/or on my website.

(d) Website clients – in addition to (a) and (b) above, website clients will supply me with all the information they wish to have displayed on their website. In addition, I will obtain and store their website's ftp information, and control panel login details if/when different to my own.

#### **How is the information stored?**

The information that you provide may be retained (a) in paper form, (b) in email correspondence, (c) in a password protected spreadsheet/database (which is backed up securely onto an external hard drive and/or the Cloud. I am the only person that has the password.

#### **In the unlikely event of a data breach:**

- a) all individuals affected, or likely to be affected, will be informed of the event
- b) any passwords used to protect personal data files will be changed.

#### **Will I contact you for anything else?**

I loathe spam emails as much as you do! I will therefore only contact you by email if it is

- (a) directly in relation to the work I do for you,
- (b) special offers, or seasonal greeting.

Any marketing emails will have an 'unsubscribe' option in the email. Opt-out requests such as this will be processed as soon as possible but certainly within 30 days.

#### **Transfer to countries outside the EEA**

I will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual (e.g. USA).

#### **Website contact form**

Should you choose to contact me using the contact form on my website, none of the data that you supply will be stored by the website or passed to/be processed by any third-party data processor. Instead the data will be collated into an email and sent, via secure servers, to me over the Simple Mail Transfer Protocol (SMTP).

#### **Website visitation tracking**

I do not use Google Analytics, Cookies or a counter on my website.