

Privacy policy

1. Introduction

- 1.1 I am committed to safeguarding the privacy of my website and social media visitors and my service users.
- 1.2 This policy applies where I am acting as a data controller with respect to the personal data of my website visitors and service users; in other words, where I determine the purposes and means of the processing of that personal data.
- 1.3 By using my website and agreeing to this policy, you consent to my use of cookies in accordance with the terms of this policy.
- 1.4 In this policy, "I", "my" and "me" refer to *Mr. Matthew James Prior*.

2. Credit

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

3. How I use your personal data

- 3.1 In this Section 3 I have set out:
 - (a) the general categories of personal data that I may process;
 - (b) in the case of personal data that I did not obtain directly from you, the source and specific categories of that data
 - (c) the purposes for which I may process personal data; and
 - (d) the legal bases of the processing.
- 3.2 I may process data about your use of my website, social media 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 my 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.
- 3.3 I may process your account data ("**account data**"). The account data may include your name, email address and phone number. The source of the account data is you. The account data may be processed for the purposes of operating my website, providing my services, ensuring the security of my website and services, maintaining back-ups of my databases and communicating with you. The legal basis for this processing is my legitimate interests, namely the proper administration of my website and business OR the performance of a contract between you and I and/or taking steps, at your request, to enter into such a contract OR consent.

- 3.4 I may process your information included in your personal profile on my website or on social media. ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of my website and services. The legal basis for this processing is consent OR my legitimate interests, namely the proper administration of my website and business OR the performance of a contract between you and I and/or taking steps, at your request, to enter into such a contract OR consent.
- 3.5 I may process your personal data that is provided in the course of the use of my services ("**service data**") or in the course of me acquiring your services. The service data may include name, address, e-mail address, bank and Paypal details and telephone numbers. The source of the service data is you. The service data may be processed for the purposes of providing my services, ensuring the security of my website and services, maintaining back-ups of my databases and communicating with you. The legal basis for this processing is the performance of a contract between you and I and/or taking steps, at your request, to enter into such a contract.
- 3.6 I may process information that you or I post for publication on my social media pages. ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering my website and services. The legal basis for this processing is consent which will be sought from you before publication.
- 3.7 I may process information contained in any enquiry you submit to me 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 the performance of a contract between you and I and/or taking steps, at your request, to enter into such a contract.
- 3.8 I may process information relating to transactions, including purchases of goods and services, that you enter into with me and/or through my 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 I and/or taking steps, at your request, to enter into such a contract and my legitimate interests, namely my interest in the proper administration of our website and business.
- 3.9 I do not currently process information that you provide to me for the purpose of subscribing to my email notifications and/or newsletters ("**notification data**"). Should this situation change, I will seek your active consent before processing any notification data for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.

- 3.10 I may process information contained in or relating to any communication that you send to me ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. My 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 my legitimate interests, namely the proper administration of my website and business and communications with users.
- 3.11 I may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is my legitimate interests, namely the protection and assertion of my legal rights, your legal rights and the legal rights of others.
- 3.13 I may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is my legitimate interests, namely the proper protection of my business against risks.
- 3.14 In addition to the specific purposes for which I may process your personal data set out in this Section 3, I may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which I am subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.15 Please do not supply any other person's personal data to me, unless I prompt you to do so.

4. Providing your personal data to others

- 4.1 I may disclose your personal data to my insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.2 I may disclose your contact details to my subcontractors insofar as reasonably necessary for delivering my service to you.
- 4.3 Financial transactions relating to my website and services may be handled by my payment services providers, Paypal and Royal Bank of Scotland. I will share transaction data with my 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. You can find information about the payment services providers' privacy policies and practices at:

<https://www.paypal.com/ee/webapps/mpp/ua/privacy-prev>

<https://personal.rbs.co.uk/global/privacy.html>

- 4.4 In addition to the specific disclosures of personal data set out in this Section 4, I may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which I am 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.

5. Retaining and deleting personal data

- 5.1 This Section 5 sets out my data retention policies and procedure, which are designed to help ensure that I comply with my legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that I process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 I will retain your personal data as follows:
- (a) Names, addresses, contact details, payment details will be retained for a minimum period of 1 year following the date they are recorded, and for a maximum period of 2 years following that date where needed for tax and accounting purposes.
- 5.4 In some cases it is not possible for me to specify in advance the periods for which your personal data will be retained. In such cases, I will determine the period of retention based on the following criteria:
- (a) the period of retention of all data will be determined based on relevant legal requirements such as may be imposed by HMRC.
- 5.5 Notwithstanding the other provisions of this Section 5, I may retain your personal data where such retention is necessary for compliance with any other legal obligation to which I am subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

- 6.1 I may update this policy from time to time by publishing a new version on my website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 6.3 I may notify you of changes to this policy by email.

7. Your rights

- 7.1 In this Section 7, I have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in my summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 7.2 Your principal rights under data protection law are:
- (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;
 - (d) the right to restrict processing;
 - (e) the right to object to processing;
 - (f) the right to data portability;
 - (g) the right to complain to a supervisory authority; and
 - (h) the right to withdraw consent.
- 7.3 You have the right to confirmation as to whether or not I process your personal data and, where I do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, I will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a fee of £10.
- 7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; I no longer

need the personal data for the purposes of my processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, I may continue to store your personal data. However, I will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- 7.7 You have the right to object to my processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in me; or the purposes of the legitimate interests pursued by me or by a third party. If you make such an objection, I will cease to process the personal information unless I can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8 You have the right to object to my processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, I will cease to process your personal data for this purpose.
- 7.9 You have the right to object to my processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.10 To the extent that the legal basis for my processing of your personal data is:
- (a) consent; or
 - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract; or
 - (c) that the processing is necessary for my legitimate business interests
- and such processing is carried out by automated means, you have the right to receive your personal data from me in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.11 If you consider that my processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

- 7.12 To the extent that the legal basis for my processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 7.13 You may exercise any of your rights in relation to your personal data by written notice to me in addition to the other methods specified in this Section 7.

8. About cookies

- 8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that I store about you may be linked to the information stored in and obtained from cookies.

9. Cookies

- 9.1 I do not directly use cookies through my website or social media, however, cookies may be used by my service providers.

10. Cookies used by my service providers

- 10.1 My service providers may use cookies and those cookies may be stored on your computer when you visit my website.
- 10.2 I use Squarespace and Google Analytics to analyse the use of my website. Squarespace and Google Analytics gather information about website use by means of cookies. The information gathered relating to my website is used to create reports about the use of my website. You can view the privacy policies of these service providers at:

<https://www.squarespace.com/privacy/>

<https://www.google.com/policies/privacy/>.

- 10.3 I use *Facebook, Twitter, Youtube, Vimeo, LinkedIn, Mandy and Star of Service* to publicise my services. These services use cookies for analyzing use of these accounts and for monitoring the performance of advertisements. You can view the cookie policies of these service providers at:

<https://www.facebook.com/policies/cookies>

<https://help.twitter.com/en/rules-and-policies/twitter-cookies>

<https://policies.google.com/privacy?hl=en-GB&gl=uk>

<https://vimeo.com/privacy>

<https://www.linkedin.com/legal/privacy-policy>

<https://www.mandy.com/page/privacy#>

https://www.starofservice.co.uk/privacy_policy

11. Managing cookies

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you will not be able to use all the features on my website.

12. My details

12.1 The website is owned and operated by Matthew James Prior.

12.2 The company is operated as a sole trader by Matthew James Prior.

12.3 My principal place of business is at 19 Wentworth Close, Worthing, West Sussex, BN13 2LQ

12.4 You can contact me:

- (a) by post to the business postal address given above
- (b) using my website contact form

(c) by telephone, on the contact number published on my website

(d) by email, using the email address published on my website

13. Data protection officer

13.1 My data protection officer's contact details are: Matthew James Prior.
info@mattprior.tv, 07812 454 785.

Notes

Section 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".