

SOCIAL MONKEY LTD PRIVACY POLICY

At Social Monkey Ltd we are committed to protecting and respecting your privacy.

This Policy aims to give you information on how we collect and process data. It explains when and why we collect personal information about people, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

Controller

Social Monkey Ltd is the Data Controller and responsible for your personal data.

Contact Details

We have appointed Melanie Harriss who is responsible for overseeing questions in relation to this privacy notice. Any questions regarding this Policy and our privacy practices should be sent by email to melanie@social-monkey.co.uk or by writing to Social Monkey Ltd, Office 2, The Sackhouse, Wells-next-the-Sea, Norfolk, NR23 1AU.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes first name, last name, title.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Financial Data We will keep a record of any financial transactions you make with us but we do not directly collect, process or store your credit or debit card information.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and

genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How do we collect information from you?

We collect information about you when you:

- complete the contact form on our website
- place an order for products or services
- engage with any other forms within our site
- correspond with us via email or otherwise
- voluntarily complete customer surveys
- provide feedback.

We make every practical effort to avoid excessive or irrelevant collection of data. However, we encourage you to contact melanie@social-monkey.co.uk if you have any concerns.

How will we use your data?

We will only use your personal data when the law allows us to. Most commonly we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your personal data

The personal information we collect allows us to:

- Contact you regarding queries raised
- Provide the products or services you have ordered
- Administer our website and provide customer services
- Meet legal, regulatory and compliance requirements
- Communicate with you
- Investigate any complaints
- Deal with entries into a competition

- Seek your views or comments on the services we provide
- Notify you of changes to our service
- Detect and reduce fraud and credit risk
- Contact you about our products and services which we think might be of interest to you (where we have the appropriate permissions to do so).

What happens when you visit our website

Like many other websites, the Social Monkey Ltd website uses cookies. Cookies are very small text files that are stored on your computer when you visit most websites.

We use cookies to help provide you with a better website by enabling us to monitor which pages you find useful. A cookie does not give us access to your computer or any information which identifies you personally, other than the data you choose to share with us.

The information we collect in this way is used for internal review and improvement purposes. This information is not shared with other organisations for commercial purposes. Specifically, we use the following cookies:

Google Analytics: to track how many visitors come to our site and how they found us.

WordPress: this site is built on the WordPress content management system which uses cookies to enhance your experience.

Social media sharing: we use Facebook, Twitter and Google+ functionality so you can share items of interest

Google Maps: These are Google Maps third party cookies, which are unique identifiers to allow traffic analysis to Google Maps

If you would rather not allow cookies you can deactivate the cookie function on your web browser, although this may have an impact on your browsing experience. Further information about the use of cookies, including their deactivation, can be found at www.allaboutcookies.org. This website is run by the Interactive Advertising Bureau and provides guidance to users on how to turn off cookies.

Marketing communications

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted.

When you have given us the appropriate permissions, we may from time to time contact you by email or post about our products and services that may be of interest to you.

Opting out

If at any point you would like to opt out of receiving such marketing communications from us, or would like to change the channels that we use to contact you, please click on the unsubscribe button at the bottom of any emails you receive, or email us, stating your preferences at info@social-monkey.co.uk

Who has access to your information?

We will never sell or rent your information, or share your data with a third party for marketing purposes.

Disclosure of your Personal Data

We may have to share your personal data and employ the services of third party service providers to help us in certain areas such as website hosting and sending you mailings. In some cases the third party may receive your information. We disclose only the personal information that is necessary to deliver the service and only work with trusted providers who have robust privacy policies of their own. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions

Examples of third party providers we work with:

- **MailChimp:** to deliver marketing emails. We gather statistics around email open rates and click through rates using industry standard technologies.

We may release your data to a third party if required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

How do we protect your information?

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.

How long will we keep your data?

We will hold your personal information on our systems for as long as is necessary for the relevant activity or until a user requests that we delete it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Accessing and updating your details

The accuracy of your information is important to us. You have the right to request a copy of the information we hold about you so that you can ensure its accuracy. You can do this by emailing melanie@social-monkey.co.uk writing to us at Office 2, The Sackhouse, Wells-next-the-Sea, Norfolk, NR23 1AU.

Transferring your information outside of Europe

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

If you wish to exercise any of the rights set out above, please contact us melanie@social-monkey.co.uk

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from 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.

Time limit to respond

We try to respond to all legitimate requests within one month. 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 and keep you updated.

Links to other websites

This privacy notice does not cover the links within the site linking to other websites. We encourage you to read the privacy statements on each website you visit.

Changes to this privacy notice

We will review this notice from time to time. This privacy notice was last updated on 22 May 2018.

How to contact us

If you want to request information about our privacy policy you can email melanie@social-monkey.co.uk or write to: Social Monkey Ltd, Office 2, The Sackhouse, Wells-next-the-Sea, Norfolk, NR23 1AU.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.