# **Sheila Harper Privacy Policy**

#### 1. Introduction

Sheila Harper recognises that your personal privacy is a serious and important issue and we support the principle of protecting privacy on the Internet within the context of current UK legislation. This privacy policy provides you with details of how we collect and process your personal data through your use of our website: Sheila Harper. We are committed to protecting your personal information. This policy sets out how we use the information that you provide us with.

By using the Sheila Harper website, you consent to the collection and use of your personal information in accordance with this policy. Any changes to this policy will only be notified on this page.

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

SHEILA HARPER is the data controller and we are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

#### **Contact Details**

Our full details are:

Name: SHEILA HARPER

• Email address: info@sheilaharper.co.uk

• Postal address: 9 The Meadows, Brereton, Rugeley, Staffs WS15 1JH, United Kingdom

• Telephone: 0044 1889 802 685

**About us:** SHEILA HARPER is an internationally recognised organisation for delivering courses and services to professional bodies and individuals. We keep our promises, and that includes treating your personal details with care.

It is important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at info@sheilaharper.co.uk

# 2. What data we collect about you, for what purpose and on what grounds we process it

Personal data means any information capable of identifying an individual. It does not include anonymised data.

## We will not sell your data to any third parties.

Your Information: what we collect and how we use it

SHEILA HARPER collects information in a number of different ways. For example, we ask for contact and other information when you contact us to enquire about enrolling on a course run by, or purchasing goods from SHEILA HARPER

We may process the following categories of personal data about you:

- Communication Data that includes any communication that you send to us whether that be through a contact form on our website, through email, text, chat service on our sites, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- Customer Data that includes data relating to any purchases of goods and/or services such as
  your name, title, billing address, delivery address email address, phone number, contact
  details, purchase details and your card details. We process this data to supply the goods
  and/or services you have purchased and to keep records of such transactions. Our lawful
  ground for this processing is the performance of a contract between you and us and/or
  taking steps at your request to enter into such a contract.
- User Data that includes data about how you use our website and any online services
  together with any data that you post for publication on our website or through other online
  services. We process this data to operate our website and ensure relevant content is
  provided to you, to ensure the security of our website, to maintain back- ups of our website
  and/or databases and to enable publication and administration of our website, other online
  services and business. Our lawful ground for this processing is our legitimate interests which
  in this case are to enable us to properly administer our website and our business.
- Technical Data that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.
- Marketing Data that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. We do not collect any Sensitive Data about you. Sensitive data refers to data that 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. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered or that we are already providing to you but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary.

# What the Law says about protection of personal information

The Law on Data Protection is derived from various pieces of legislation (can be found in a number of places). These include the Data Protection Act and the incoming General Data Protection Regulation (the 'GDPR') which became enforceable on 25 May 2018. The GDPR states that personal data (information relating to a person that can be individually identified) can only be processed if there is a legal ground to do so. Activities like collecting, storing and using personal information would fall into the GDPR's definition of processing. The GDPR provides six legal grounds (reasons) under which personal information can be processed (used) in a way that is lawful. For the processing to be permitted by law (lawful), at least one of the legal grounds must apply.

The four legal grounds that are most relevant to SHEILA HARPER's use of your personal information are:

- Consent
- Legitimate Interest
- Contract
- Legal Obligation

# How the law applies to SHEILA HARPER's use of personal information

SHEILA HARPER will only process (use) your personal information if we have:

- asked you and have a record of your express and recent consent for us to do so;
- a 'Legitimate Interest' to do so in order to support our purposes. Our use will be fair and balanced and never unduly have an impact on your rights.;
- a contract with you that we can only fulfil by using your personal information, e.g. to send you an item that you have requested;
- a legal obligation to use or disclose information about you.

In extreme situations, such as an accident or medical emergency, we may share your personal details with the emergency services if it is essential for the preservation of life (yours or another person's) for us to do so. This is the 'vital interest' ground for using your personal information. After the emergency, we will always try to inform you about how we had to use your information in that extreme situation.

We will not unduly prioritise our interests as an organisation over your interests as an individual. We will always balance our interests with your rights. We will only use personal information in a way and for a purpose that you would reasonably expect in accordance with this Policy.

SHEILA HARPER will not rent, swap or sell your personal information to other organisations for them to use in their own marketing activities.

#### 3. Consent

SHEILA HARPER will always ask for your consent before we communicate with you for certain purposes. For example, we will only email or send you a newsletter if we have an accurate record of your recent and freely given consent to do so.

You can withdraw your consent at any time by phoning 01889 802 685 or emailing <a href="mailto:info@sheilaharper.co.uk">info@sheilaharper.co.uk</a>

#### 4. LEGITIMATE INTEREST

What is Legitimate Interest: This legal ground for processing means that organisations can process your personal information if they 1). have a genuine and legitimate reason for doing so and 2). That use does not harm any of your rights and interests as an individual.

**SHEILA HARPER's Legitimate Interest:** We do not unduly prioritise our legitimate interests as an organisation over your interests as an individual. We always respect your rights.

What we have a Legitimate Interest to do: We believe that SHEILA HARPER's clients, students, members (and anyone enquiring about courses, services or membership) are connected to SHEILA HARPER's goal to improve the lives of companion animals and their caretakers, and that they want to know how they can continue to get involved with the work we do. Unless you tell us not to, we think you are content for us to process (keep and use) your personal information for the following lengths of time. We promise not to keep your personal information for longer than we specify below. This is not the length of time that we will continue to contact you – this could be a shorter period of time (see below for an explanation on our personalised approach to communications).

#### Members

For SHEILA HARPER members we need to keep your personal data and details of the organisation member of which you are an individual member.

Demonstrated an interest in SHEILA HARPER via an enquiry

Those who have demonstrated an interest in SHEILA HARPER by contacting us for more information: e.g. to find out more about enrolling on a Sheila Harper course, buying products from Sheila Harper or joining the SHEILA HARPER membership organisation. We think that someone who has contacted us to find out more about SHEILA HARPER, and what we do, would like us to provide that information; perhaps a little more information; and even some support in fulfilling their initial query or request. To support this, we keep your personal information for a period of one year.

It is always your choice. If you don't think this is quite right for you, you can tell us to change your communication preferences and our use of your information. You can do this at any time by phoning 01889 802 685 or emailing <a href="mailto:info@sheilaharper.co.uk">info@sheilaharper.co.uk</a>

Legitimate Interest to send you direct mail: Unless you tell us not to, we will rely on our Legitimate Interest ground (explained above) for sending you direct mail. From time to time, we would like to post you exciting updates about our news, events, services, research, member organisations and affiliates.

We are always mindful of trying to only send you what you are interested in and only as often as is appropriate. If we do not appear to be sending communications that are of interest, we will review this and will endeavour to reduce and then stop these types of communications in a much shorter time than the above defined period of Legitimate Interest

But you are in control, so if you want to ensure that we do not send this type of communication anymore, you can update your preferences at any time by phoning 01889 802 685, email <a href="mailto:info@sheilaharper.co.uk">info@sheilaharper.co.uk</a>

**Legitimate Interest to process your information:** We aim to be clear about what information we collect, to enable you to make meaningful choices about how it is used.

When it is necessary we will contact you for administrative purposes, e.g. to contact you regarding a payment. We will also hold the minimum personal information required to support our ability to respect your preferences for communication with us.

To help you to understand when and why SHEILA HARPER would use Legitimate Interest to process your personal information we provide the following examples:

- To send postal communications (as explained above)
- To enhance, modify, personalise and improve our services and communications for the benefit of our members.
- To improve security of our websites and systems.
- To prevent fraud when transacting on our website.
- To process your payments.
- To fulfil online transactions; process and deliver your order(s). To take payment and arrange delivery, we need to collect personal information, including your payment details, your full name, delivery address and contact details.
- To analyse your personal information to ensure that our communications are relevant to you.

The above list of examples is on the basis that the processing will not be done if it harms your rights and interests as an individual, or if you tell us that you'd like us to stop. You can do this at any time by phoning 01889 802 685 or emailing info@sheilaharper.co.uk

**Data Analysis:** In order to communicate with you more effectively and better understand your preferences we may analyse your data.

#### 5. MARKETING COMMUNICATIONS

- Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).
  - Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.
- We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing

communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

If you have given us your consent, we will contact you with information and updates on SHEILA HARPER news and events. This may be by email and newsletters emailed to you, depending on your preferences. We will also continue to ask about your preferences, to ensure that you are still happy to be contacted by us and by which means.

#### 6. DATA SECURITY

**Data Sharing:** To help us communicate with you we use trusted service providers including direct mailing providers.

SHEILA HARPER does not share, sell or swap your information with other organisations.

In some circumstances, such as sending logo files and certificates of attendance for webinars and courses, it is necessary for SHEILA HARPER to give its staff access to your personal information. This access is only granted to the extent necessary for them to perform their services for us. We require all service providers to comply with strict rules to protect the information you have given us.

We process data at our registered offices 9 The Meadows, Brereton, Rugeley, Staffs WS15 1JH, UK and at the sites of data processors and third parties appointed by us. Some of these processors may be outside the EEA.

We apply UK data protection law to our processing.

Changes to your data: From time to time we may contact you to ensure that the information you have provided us with remains accurate and up to date. Should you wish to change your preferences you can do this by writing to us at 9 The Meadows, Brereton, Rugeley, Staffs WS15 1JH, UK by phone on 01889 802 685 by email addressed to <a href="mailto:info@sheilaharper.co.uk">info@sheilaharper.co.uk</a>

Like all organisations, we would comply with requests for the disclosure of personal information where this is required or permitted by law. This could include requests from law enforcement or tax agencies. In these circumstances, the request must be submitted in writing and in accordance with the relevant legal requirements.

#### 7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

#### 8. YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

If you wish to exercise any of the rights set out above, please email us at privacy@collaboris.com.

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 or refuse to comply with your request in these circumstances.

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.

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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<a href="www.ico.org.uk">www.ico.org.uk</a>). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

#### 9. 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. When you leave our website, we encourage you to read the privacy notice of every website you visit.

#### 10. COOKIES

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

**Web Privacy:** We at SHEILA HARPER guarantee our commitment to respecting and protecting your online privacy.

This includes your need and your right to know what we do with the personal information you share with us. It also guides our organisation's policies regarding the management of this data, including how the information is collected, processed, and for what purposes.

"SHEILA HARPER": refers to the web pages. By accessing this website, you are consenting to the way information is collected and used, as described within this Privacy Policy. In return, SHEILA HARPER gives the commitment that we will use the personal data you provide only in ways that are compatible with the following Privacy Policy.

The collection of information: Every time you log on to our website your IP (Internet Protocol) address registers on our servers. Your IP address reveals no information other than the number assigned to you. We do not use this technology to get any personal data against your knowledge or free will (i.e., automatically recording e-mail addresses of visitors). Nor do we use it for any purpose other than to help us monitor traffic on our website, or (in case of criminal activity or misuse of our information) to cooperate with law enforcement.

**Cookies:** We use a number of different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit <a href="http://www.aboutcookies.org">http://www.aboutcookies.org</a> for detailed guidance.

The list below describes the cookies we use on this site and what we use them for. Currently we operate an 'implied consent' policy which means that we assume you are happy with this usage. If you are not happy, then you should either not use this site, or you should delete the cookies having visited the site, or you should browse the site using your browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.)

## First Party Cookies

These are cookies that are set by this website directly.

Google Analytics: We use Google Analytics to collect information about visitor behaviour on our website. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. This Analytics data is collected via a JavaScript tag in the pages of our site and is not tied to personally

identifiable information. We therefore do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

Find out more about Google's position on privacy as regards its analytics service.

Third Party Cookies

These are cookies set on your machine by external websites whose services are used on this site. Cookies of this type are the sharing buttons across the site which allow visitors to share content onto social networks. Cookies are currently set by LinkedIn, Twitter, Facebook, Google+ and Pinterest. In order to implement these buttons and connect them to the relevant social networks and external sites, there are scripts from domains outside of our website. You should be aware that these sites are likely to be collecting information about what you are doing all around the internet, including on this website.

You should check the respective policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

**Web Security:** Financial transactions made online to SHEILA HARPER using this site are secure. No one can access your credit card details or PayPal details via the internet.

**How our website works:** When you wish to make a payment you are taken to a secure page for payment.

Our secure server communicates with your browser using SSL (Secure Sockets Layer) protocols, so that all your personal information, including PayPal details or credit card number and your name and address, is encrypted. This process takes the words and figures you enter and converts them into bits of code that are then securely transmitted over the internet.

**Information:** All information given on this site is to the best of our ability. From time to time, we will make changes to the information on this page. The amended information will apply from the date it is posted on the site and will govern the way in which we collect and use personal information from then on.

By using this site, you are accepting this policy and terms of service.

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