

DATA PRIVACY NOTICE

This Privacy Notice explains the types of personal data we may collect about you when you interact with us. It also explains how we store and handle that data, and keep it safe.

1.WHO WE ARE AND WHAT WE DO

R J Spicer Goldsmith Ltd is located at 21 Suffolk Road, Cheltenham, Glos, GL50 2AF.

We create handcrafted contemporary jewellery which is unique to our clients; this includes unique pieces commissioned for engagements and weddings. Our range of products is available from our shop.

2. THE FIRST POINT OF CONTACT FOR DATA PROTECTION

If you have any concerns or queries about our data protection procedures please contact: Lisa Spicer t:01242574871, e: info@rjspicer.com

3. WHY WE PROCESS DATA

We process personal information so that we can create and make jewellery for our customers. To do this we need to collect and process information such as names, contact and payment details. We also need to buy products from our suppliers and to do this we need their details too.

4. LEGAL BASES FOR PROCESSING YOUR DATA INCLUDING ANY EXPLANATION OF LEGITIMATE INTERESTS

Data protection law sets out a number of different reasons for which a business may collect and process personal data. Some of these reasons, set out below, are the bases we have for processing your personal information.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. For example when a customer orders a wedding ring we need their name, contact details and payment information so that we can fulfil the order. We may also collect personal information such as a customers likes and dislikes which would not be classified as “data” for the purposes of data protection laws, but we think it’s important that our customers know that we hold this information in the same way as any other. We use this information so that we can produce personalised and unique products.

We also process supplier information so that we can fulfil all of our contractual obligations

Legal obligations

We also process some personal data to fulfil our legal obligations. For example, we are obliged to retain certain information for HMRC reporting purposes or to comply with other legislative provisions

Legitimate interest

In particular circumstances, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

We retain customer and supplier information for 6 years after a contract has been completed so that we can maintain good working relationship with everyone we work with.

5. WHEN WE COLLECT DATA

We collect data at various points:

- When a customer contacts us through our contact form on our website
- When a customer or supplier contacts us via email or telephone we take a note of the contact details
- During consultations with customers
- At the point of sale to a customer or the point of settling invoices with our suppliers

6. TYPE OF DATA WE COLLECT

- We process contact information including: name, address, phone number, email address for our customers and suppliers
- We retain contact details for prospective customers or anyone who contacts us with an enquiry
- Credit and debit card details are processed and retained in paper form
- We process limited financial details for our suppliers so we can settle invoices
- In some circumstances we collect and process more personal details such as ring finger size or your design preferences so that we make jewellery unique to our customers
- Our website uses cookies. A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of the website which helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

For example, the cookies we use are 'analytical' cookies including standard Google analytic cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they're using it. This helps us to improve the way our website works.

7. HOW WE USE YOUR PERSONAL DATA

We process data for a variety of reasons. Each of these relate to the running of the business and giving our customers or clients the best experience possible.

- To process orders, deliver contracts or services
- To reply to any queries or questions you may have
- To book appointments or consultations
- To communicate with our customers and suppliers about any queries
- To comply with legal requirements such as HMRC reporting
- To maintain good ongoing customer/client and business relationships

8. HOW LONG WE KEEP YOUR PERSONAL DATA

Whenever we collect or process your personal data, we only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will be deleted completely.

Some examples of our data retention periods:

Purchases and Services

When you place an order or buy one of our products or services we keep the personal data you give us for 6 years so we can comply with our legal, contractual obligations and retain a good relationship with you should you need any further product or services have any future queries.

Suppliers/

For individuals who are supplying us with products or services we retain your personal information for a period of 6 years beyond the contract so that we can, if necessary, contact you again and continue our business relationship with you

We are also obliged to retain certain transactional information for 6 years to satisfy accounting rules

9. HOW WE KEEP YOUR DATA SAFE

We are aware of the need to maintain the correct and highest level security when processing your personal information. We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way.

We take the following steps to maintain the security of your personal information:

- we keep all of your information in systems that are secure including secure emails,
- we limit access to your personal information to those who have a genuine business need to know it.
- we have password protected systems and always use passwords in line with the most up to date advice from our service providers (Apple, Microsoft and Google)
- we maintain firewalls and anti-virus software - these are automatically updated and checked regularly
- any data which is accessed off site or on a mobile device is kept locked when not in users password or fingerprint protected and never left unattended

Any documentation retained in paper form or kept in a safe in our office.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

10. WHO WE SHARE YOUR DATA WITH

We sometimes share your personal data with trusted third parties which act only on our instruction (known as “data processors”).

Data processors might be, for example those companies who store data for us and our IT provider:

Where we share information with these companies or individuals we make sure that they also keep your data secure and that they also protect your rights. To this end we make sure that:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them or where their terms and conditions of processing contain the correct data processor clauses under GDPR

- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Sharing your data with third parties for their own purposes (“joint controllers”) eg HMRC, accountants:

We will only do this in very specific circumstances, for example:

- With your consent
- Where we have a sharing agreement in place with the other party
- Where we are obliged to share the information for legal reasons

11. WHERE YOUR DATA IS PROCESSED

We do not routinely transfer data outside of the EEA.

From time to time your personal data such as your name and email address may be passed to other services that we use to send out communications (for example email communications).

However, your personal data will remain in the EU or countries considered by the EU to have equivalent policies such as Jersey, Guernsey, Switzerland, New Zealand and Canada. Companies based in the USA that have certified with the EU-US Privacy Shield programme are also considered to be permitted destinations by the EU (this includes popular US products like Gmail, Microsoft Office and iCloud).

12. YOUR RIGHTS AND WHO TO CONTACT

You have the following rights, which you can exercise free of charge:

| | |
|---------------------------|--|
| Access | The right to be provided with a copy of your personal data |
| Rectification | The right to require us to correct any mistakes in your personal data |
| To be forgotten | The right to require us to delete your personal data—in certain situations |
| Restriction of processing | The right to require us to restrict processing of your personal data—in certain circumstances, eg if you contest the accuracy of the data |
| Data portability | The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations |
| To object | The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests. |

Not to be subject to automated individual decision-making

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

If you would like to exercise any of those rights, please contact us at: Lisa Spicer t: 01242574871, e: info@rjspicer.com

OTHER RIGHTS

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We will then stop processing your information unless we believe we have a legitimate overriding reason to continue processing.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

For us to check your identity please:

- let us have enough information to identify you [(eg your full name, address and client or matter reference number)];
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

If we choose not to action your request we will explain to you the reasons for our refusal.

Your right to contact the ICO

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact the ICO by calling 0303 123 1113.

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence

You also have the right to take to seek a judicial remedy