

Privacy Policy

Privacy Policy

We are committed to safeguarding the privacy of our website visitors; this policy sets out how we will treat your personal information.

(1) What information do we collect?

We may collect, store and use the following kinds of personal information:

- [(a) information about your computer and about your visits to and use of this website (including [your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation and user log in details.
- [(b) information relating to any transactions carried out between you and us on or in relation to this website, including information relating to any purchases you make of our goods or services.
- [(c) information that you provide to us for the purpose of registering with us.

[Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with the terms of this privacy policy.]

(2) Using your personal information

Personal information submitted to us via this website will be used for the purposes specified in this privacy policy or in relevant parts of the website.

We may use your personal information to:

- [(a) administer the website;]
- [(b) improve your browsing experience by personalising the website;]
- [(c) enable your use of the services available on the website;]
- [(e) send statements and invoices to you, and collect payments from you;]
- [(f) send you general (non-marketing) commercial communications;]
- [(g) send you email notifications that you have specifically requested;]
- [(h) send you occasional newsletters]
- [(j) deal with enquiries and complaints made by or about you relating to the website;]
- [(k) keep the website secure and prevent fraud;]
- [(l) verify compliance with the terms and conditions governing the use of the website

[Where you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us.]

[Your privacy settings can be used to limit the publication of your information on the website. You can adjust your privacy settings by *[describe how]*.]

[We will not, without your express consent, provide your personal information to any third parties for the purpose of direct marketing.]

[All our website financial transactions are handled through our payment services provider, PayPal. You can review the PayPal privacy policy at www.paypal.com. We will share information with [PayPal] only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.]

(3) Disclosures

We may disclose your personal information to [any of our employees, officers, agents, suppliers or subcontractors] insofar as reasonably necessary for the purposes set out in this privacy policy.

[We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this privacy policy.]

In addition, we may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- [(d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and]
- [(e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.]

Except as provided in this privacy policy, we will not provide your information to third parties.

(4) International data transfers

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy.

Information that you provide may be transferred to countries that do not have data protection laws equivalent to those in force in the European Economic Area.

You expressly agree to such transfers of personal information.

(5) Security of your personal information

We will take reasonable technical and organisational precautions to prevent the loss,

misuse or alteration of your personal information.

We will store all the personal information you provide on our secure (password- and firewall-protected) servers.¹

[All electronic transactions entered into via the website will be protected by encryption technology.]

You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

[You are responsible for keeping your password [and other login details] confidential. We will not ask you for your password (except when you log in to the website).]

(6) Policy amendments

We may update this privacy policy from time to time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

[We may also notify you of changes to our privacy policy by email.]

(7) Your rights

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at GBP 10); and
- (b) the supply of appropriate evidence of your identity [(for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address)].

We may withhold such personal information to the extent permitted by law.

You may instruct us not to process your personal information for marketing purposes[, by sending an email to us]. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

(8) Third party websites

The website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

(11) Updating information

Please let us know if the personal information that we hold about you needs to be corrected or updated.

(12) Contact

If you have any questions about this privacy policy or our treatment of your personal information, please write to us by email to enquiries@onlinegovernor.
