



## **Data Protection & Privacy Policy & Procedure**

### **Data Protection Policy Statement.**

Sanctuary SHE is committed to full compliance with the requirements of the General Data Protection Regulation and will therefore follow procedures which aim to ensure that anyone working for or on behalf of Sanctuary SHE who has access to any personal data held by or on behalf of Sanctuary SHE is fully aware of and abide by their duties under the General Data Protection Regulation (2018).

### **Handling personal data.**

Sanctuary SHE needs to collect and use information about customers. In order to comply with regulations and ensure the confidence of these groups of people, Sanctuary SHE will always:

- Strive to collect and process only the data or information which is needed.
- Use personal data for such purposes as are described at the point of collection, or for purposes which are legally permitted.
- Strive to ensure information is accurate.
- Not keep information for longer than is necessary and securely destroy data which is no longer needed.
- Take appropriate technical and organisational security measures to safeguard information. (Including unauthorised or unlawful processing and accidental loss or damage of data).
- Ensure that the rights of people about whom information is held can be fully exercised under the General Data Protection Regulation.

These rights include:

- The right to be informed.
- The right of access to personal information.
- The right to request rectification.
- The right to request erasure.
- The right to restrict processing in certain circumstances.
- The right to data portability.
- The right to object to processing.

### **The principles of Data Protection.**

Anyone processing personal data must comply with the following 6 principles of good practice that require that personal data should be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

4. Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The Act provides conditions for the processing of any personal data. It also makes a distinction between personal data and 'special category' data.

Personal data is defined as any information relating to an identified or identifiable natural person.

Special category data is defined as personal data consisting of information as to:

- Racial or ethnic origin
- Political opinion
- Religious/philosophical beliefs
- Trade union membership
- Physical or mental health or condition
- Sexual life or sexual orientation
- Biometric data

## Procedures.

The following personal information may be collected by Sanctuary SHE:

- Customer details, including name, address & contact number/email address. These details are stored electronically on a password protected computer. Details are only kept as long as Sanctuary SHE continues to work for the customer.
- Signed customer agreements are kept in a folder and are only retained for as long as Sanctuary SHE continues to work for the customer.
- Details of customer business activities and how these activities are carried out. In order to provide Health, Safety & Environmental services it is necessary for Sanctuary SHE to gather information about the customer's business and working practices. This information is stored electronically on a password protected computer. Details are only kept as long as Sanctuary SHE continues to work for the customer.
- Details of customer employees & sub-contractors. Sanctuary SHE may carry out training & competence assessments of customer employees and evaluation of sub-contractors. The information gathered is stored electronically on a password protected computer. Details are only kept as long as Sanctuary SHE continues to work for the customer.



## **Privacy**

### **Introduction**

This Privacy Policy outlines Sanctuary SHE practices with respect to information collected from users who access our website at <https://www.sanctuaryshe.co.uk> or otherwise share personal information with us.

### **Grounds for data collection**

Processing of your personal information (i.e. any information which may potentially allow your identification through reasonable means; hereinafter " Personal Information ") such as is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

When you use the Site, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy.

We encourage our Users to carefully read the Privacy Policy and use it to make informed decisions.

### **What information do we collect?**

We collect two types of data and information from Users.

The first type of information is un-identified and non-identifiable information pertaining to a User(s), which may be made available or gathered via your use of the Site (" **Non-personal Information** "). We are not aware of the identity of a User from which the Non-personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time, etc.) in order to enhance the functionality of our Site. We may also collect information about your activity on the Site (e.g. pages viewed, online browsing, clicks, actions, etc.).

The second type of information is **Personal Information** which is individually identifiable information, namely information that identifies an individual or may, with reasonable effort, identify an individual. Such information includes:

- **Device Information:** We collect Personal Information from your device. Such information includes geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Site.
- **Registration information:** When you send an enquiry through our Site you will be asked to provide us with certain details such as: full name; email or physical address, and other information.



## How do we receive information about you?

We receive your Personal Information from various sources:

- When you voluntarily provide us with your personal details in order to register on our Site.
- When you use or access our Site in connection with your use of our services.
- From third-party providers, services and public registers (for example, traffic analytics vendors).

## User Rights.

We do not rent, sell or share Users' information with third parties, except as described in this Privacy Policy.

We may use the information for the following:

- Communicating with you – sending you notices regarding our services, providing you with technical information and responding to any customer service issue you may have.
- To communicate with you and to keep you informed about our latest updates and services.
- To market our websites and products (see more under "Marketing").
- For statistical and analytical purposes, intended to improve the Site.

In addition to the different uses listed above, we may transfer or disclose Personal Information to our business partners, suppliers and sub-contractors for help with our provision of services to you.

In addition to the purposes listed in this Privacy Policy, we may share Personal Information with our trusted third-party providers for any of the following purposes:

- Hosting and operating our Site.
- Providing you with our services, including providing a personalised display of our Site.
- Storing and processing such information on our behalf.
- Providing you with marketing offers and promotional materials related to our Site and services.
- Performing research, technical diagnostics or analytics.

We may also disclose information if we have good reason to believe that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies (including our Agreement), including investigations of potential violations thereof; (iii) investigate, detect, prevent or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our users, yourself or any third party; or (vi) for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights.

You may request to:

1. Receive confirmation as to whether or not personal information concerning you is being processed and access your stored personal information, together with supplementary information.
2. Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format.
3. Request rectification of your personal information that is in our control.



4. Request erasure of your personal information.
5. Object to the processing of personal information by us.
6. Request to restrict processing of your personal information by us.
7. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute and may be subject to our own legitimate interests and regulatory requirements.

If you wish to exercise any of the above rights or receive more information, please contact our Data Protection Officer ("DPO") using the details provided below:

Daphne Withers  
daphne@sanctuaryshe.co.uk

## Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable opportunity. Under applicable regulations, we will keep records containing client personal data, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

## Cookies

We and our trusted partners use cookies and other technologies in our related services, including when you visit our Site or access our services.

A "cookie" is a small piece of information that a website assigns to your device while you are viewing a website. Cookies are very helpful and can be used for various different purposes. These purposes include allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between you and our Services quicker and easier. Cookies are also used to help ensure that the advertisements you see are relevant to you and your interests and to compile statistical data on your use of our Services.

The Site uses the following types of cookies:

- a. **'session cookies'** which are stored only temporarily during a browsing session in order to allow normal use of the system and are deleted from your device when the browser is closed.
- b. **'persistent cookies'** which are read only by the Site, saved on your computer for a fixed period and are not deleted when the browser is closed. Such cookies are used where we need to know who you are for repeat visits, for example to allow us to store your preferences for the next sign-in.
- c. **'third-party cookies'** which are set by other online services who run content on the page you are viewing, for example by third-party analytics companies who monitor and analyse our web access.



Cookies do not contain any information that personally identifies you, but Personal Information that we store about you may be linked, by us, to the information stored in and obtained from cookies. You may remove the cookies by following the instructions of your device preferences; however, if you choose to disable cookies, some features of our Site may not operate properly and your online experience may be limited.

We also use a tool called "Google Analytics" to collect information about your use of the Site. Google Analytics collects information such as how often users access the Site, which pages they visit, when they do so, etc. We use the information we obtain from Google Analytics only to improve our Site and services. Google Analytics collects the IP address assigned to you on the date you visit sites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics [Terms of Use](#) and the [Google Privacy Policy](#).

### **Third-party collection of information**

Our policy only addresses the use and disclosure of information we collect from you. To the extent you disclose your information to other parties or sites throughout the internet, different rules may apply to their use or disclosure of the information you disclose to them. Accordingly, we encourage you to read the terms and conditions and privacy policy of each third party that you choose to disclose information to.

This Privacy Policy does not apply to the practices of companies that we do not own or control, nor to individuals whom we do not employ or manage, including any of the third parties which we may disclose information to as set out in this Privacy Policy.

### **How do we safeguard your information?**

We take great care in implementing and maintaining the security of the Site and your information. We employ industry standard procedures and policies to ensure the safety of the information we collect and retain, and prevent unauthorised use of any such information, and we require any third party to comply with similar security requirements, in accordance with this Privacy Policy. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorised access or abuse our Site, and we make no warranty, express, implied or otherwise, that we will prevent such access.

### **Transfer of data outside the EEA**

Please note that some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.





## Marketing

We may use your Personal Information such as your name, email address, telephone number, etc., ourselves or by using our third-party subcontractors, for the purpose of providing you with promotional materials concerning our services which we believe may interest you.

To respect your right to privacy, within such marketing materials we provide you with the means to opt out of receiving further marketing offers from us. If you unsubscribe, we will remove your email address or telephone number from our marketing distribution lists.

Please note that even if you have unsubscribed from receiving marketing emails from us, we may send you other types of important email communications without offering you the opportunity to opt out of receiving them. These may include customer service announcements or administrative notices.

## Corporate transaction

We may share information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation, or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

## Minors

We understand the importance of protecting children's privacy, especially in an online environment. The Site is not designed for or directed at children. Under no circumstances shall we allow the use of our services by minors without prior consent or authorisation by a parent or legal guardian. We do not knowingly collect Personal Information from minors. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at [daphne@sanctuaryshe.co.uk](mailto:daphne@sanctuaryshe.co.uk)

## Updates or amendments to this Data Protection & Privacy Policy

We reserve the right to periodically amend or revise the Data Protection & Privacy Policy; material changes will be effective immediately upon the display of the revised policy. The last revision will be reflected in the "Last modified" section. Your continued use of the Platform, following the notification of such amendments on our website, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

## How to contact us

If you have any general questions about the Site or the information we collect about you and how we use it, you can contact us at [daphne@sanctuaryshe.co.uk](mailto:daphne@sanctuaryshe.co.uk)

Sanctuary SHE  
Lynbrook  
Rosebank Road  
Milverton  
TA4 1PW

Last Modified 17.06.21