

WEBSITE PRIVACY POLICY

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

2. Credit

- 2.1 This document was created using a template from SEQ Legal (<http://www.seqlegal.com>).

3. Collecting Personal Information

- 3.1 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 and website navigation paths);
 - (b) information that you provide to us when registering with our website (including your email address);
 - (c) information that you provide when completing your profile on our website (including your name, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details);
 - (d) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including [your name and email address]);
 - (e) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
 - (f) information relating to any purchases you make of our services or any other transactions that you enter into through our website (including your name, address, telephone number, email address);
 - (g) information that you post to our website for publication on the internet (including [your user name, your profile pictures and the content of your posts]);
 - (h) information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication); and
 - (i) any other personal information that you choose to send to us.
- 3.2 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 this policy.

4. Using Personal Information

- 4.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- 4.2 We may use your personal information to:
- (a) administer our website and business;
 - (b) personalise our website for you;
 - (c) enable your use of the services available on our website;
 - (d) send you goods purchased through our website;
 - (e) supply to you services purchased through our website;
 - (f) send statements, invoices and payment reminders to you, and collect payments from you;
 - (g) send you non-marketing commercial communications;
 - (h) send you email notifications that you have specifically requested;
 - (i) send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
 - (j) send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
 - (k) provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
 - (l) deal with enquiries and complaints made by or about you relating to our website;
 - (m) keep our website secure and prevent fraud; and
 - (n) verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service).
- 4.3 If 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.
- 4.4 Your privacy settings can be used to limit the publication of your information on our website, and can be adjusted using privacy controls on the website.
- 4.5 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

5. Disclosing Personal Information

- 5.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy.
- 5.2 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 policy.

- 5.3 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.
- 5.4 Except as provided in this policy, we will not provide your personal information to third parties.

6. International Data Transfers

- 6.1 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 policy.
- 6.2 Personal data shall not be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the 'rights and freedoms' of data subjects in relation to the processing of personal data. The transfer of personal data outside of the EU is prohibited unless one or more of the specified safeguards or exceptions apply;
- Binding corporate rules
 - Model contract clauses in place
- 6.3 Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.
- 6.4 You expressly agree to the transfers of personal information described in this Section 6.

7. Retaining Personal Information

- 7.1 This Section 7 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 7.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 Notwithstanding the other provisions of this Section 7, we will retain documents (including electronic documents) containing personal data:
- (a) to the extent that we are required to do so by law;
 - (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and

- (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).

8. Security of Personal Information

- 8.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- 8.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.

9. Amendments

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

10. Your Rights

- 10.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
- 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).
- 10.2 We may withhold personal information that you request to the extent permitted by law.
- 10.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 10.4 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.

11. Third Party Websites

- 11.1 Our website includes hyperlinks to, and details of, third party websites.
- 11.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

12. Updating Information

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

13. Google Analytics

- 13.1 We use a tool called 'Google Analytics' to collect information about the use of this site. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site.
- 13.2 We use the information we get from Google Analytics only to improve this site. Google Analytics collects only the IP address assigned to you on the date you visit this site, 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.
- 13.3 Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. 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. You can prevent Google Analytics from recognising you on return visits to this site by disabling cookies on your browser.

13. Data Protection Registration

- 13.1 We are registered as a data controller with the UK Information Commissioner's Office.
- 13.2 Our data protection registration number is: ZA393955.

14. Our details

- 14.1 This website is owned and operated by Lysander Associates Ltd.
- 14.2 We are registered in England and Wales under registration number 4143306, and our registered office is at Greenways Studios, Lower Eashing, Godalming, Surrey, GU7 2QF.
- 14.3 Our principal place of business is at Greenways Studios, Lower Eashing, Godalming, Surrey, GU7 2QF.
- 14.4 You can contact us:
 - (a) by post, using the postal address;
 - (b) using our website contact form;
 - (c) by telephone, on +44 (0)1483 527811; or
 - (d) by email, using admin@lysanderassociates.com