



Introduction

Shakespeare Virtual Assistant Limited respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

Cookie Law – means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Personal data – means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give us via our website. This definition shall, where applicable, incorporate the definitions provided by the EU Regulation 2016/679 – the General Data Protection Regulation (GDPR).

We/Us/Our – means the website owner.

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Shakespeare Virtual Assistant Limited collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, request a service or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children. It is important that you read this Privacy Policy, together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

Controller

Shakespeare Virtual Assistant Limited is the controller and responsible for your personal data (collectively referred to as “Shakespeare Virtual Assistant Limited”, “we”, “us” or “our” in this Privacy Policy).

We have appointed a GDPR owner who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the GDPR owner using the details set out below.

Our full details are:

Full name of legal entity: Shakespeare Virtual Assistant Limited

Name or title of GDPR owner: Karen Shakespeare-Fletcher

Email address: karen@shakespeareva.org

Postal address: 48 Barton Road, Berrow, Somerset TA8 2LT

Telephone number: 0118 405 0144

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

ICO Contact details:

Information Commissioner's Office

Wycliffe House, Water Lane

Wilmslow, Cheshire

SK9 5AF

Tel: 0303 123 1113

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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 policy of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes photographs of you, first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender
- **Contact Data** includes billing address, delivery address, email address and telephone numbers
- **Financial Data** includes bank account and payment card details
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- **Profile Data** includes your username and password, orders made by you, your interests, preferences, feedback and survey responses
- **Usage Data** includes information about how you use our website and services
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy policy.

Where it is specifically relevant to the services provided and suitable safeguards have been put in place, we may process Special Categories of Personal Data about you (this 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.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services
 - create an account on our website
 - subscribe to our service or publications
 - request marketing to be sent to you
 - enter a competition, promotion or survey
 - give us some feedback
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - analytics providers such as Google based outside the EU
 - advertising networks based inside or outside the EU
 - search information providers based inside or outside the EU
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the EU
 - Identity and Contact Data from data brokers or aggregators based inside or outside the EU
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU
 - Identity and Contact Data from social media platforms based outside the EU such as Facebook

How we use your personal data

We will only use your personal data when the Law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used and how the user interacts with said page. This helps us analyse data about web page traffic and improve our website to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

How long will you use my personal data for?

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

You have the right to ask for a copy of any personal data held by us (where such data is held). Under GDPR, no fee is payable and we will provide any information in response to your request free of charge. Please contact us for more details using the contact details available on our website.

What we may need from you

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.

Time limit to respond

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 several requests. In this case, we will notify you and keep you updated.

Contacting us

If you have any questions about our site or this Privacy Policy, please contact us using the contact form on our website. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

Changes to our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the Law changes). Any changes will be immediately posted on our site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our site following the amendments. We recommend that you check this page regularly to keep up-to-date.