

RED BOOTS MARKETING PRIVACY AND COOKIE POLICY

Last updated May 2021

Introduction

Your privacy is important to Red Boots Marketing. This policy sets out information on the personal data we collect about you, and your rights in respect of this data. This policy applies whether you use or interact with our website (redbootsmarketing.com) (the “**Website**”) or whenever you place an order with us.

Our Website may contain links to third party websites that are not covered by policy. We therefore ask you to review the privacy statements of other websites and applications to understand their information practices.

This policy contains the following information:

- Information about who we are
- The changes we may make to the policy
- Information on what we can collect
- Information on cookies
- How we store your personal data
- How we disclose your information
- Your rights regarding your personal data
- What happens when we link to other websites

1. Who We Are

Our company name is Red Boots Marketing Limited, a company registered in England and Wales under company number 13117271, and with registered office at 8 Hunters Way, Sheldwich Lees, Faversham, England ME13 0NB.

We are the data controller and are responsible for your personal data. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the contact details set out below.

Our contact email address is samantha@redbootsmarketing.com

We respect your right to privacy and will only process personal information about you in accordance with applicable data protection laws. We comply with the UK Data Protection Act 2018. If any of these laws are replaced or superseded, we will also comply with that.

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.

2. Changes to the privacy policy and your duty to inform us of changes

We keep this privacy notice under regular review and, if we make any changes to this notice, we will place an updated version on our website and, where appropriate, notify you by e-mail. Regularly reviewing this page ensures you are always aware of what personal information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

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.

3. What we may collect

Personal data, or personal information, is 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 when you use our Website. Whenever we collect personal data about you, we must have a legal ground to do so. We will ensure that your personal data is processed lawfully, fairly, and transparently without adversely affecting your rights. The type of data we collect is as follows:

<u>Type of data</u>	<u>Purpose/Activity</u>	<u>Lawful Basis</u>
Identity and contact information	Includes: <ul style="list-style-type: none"> • Name • Email address • Job title • Telephone number • Office address (not always personal data) • Your message to us 	<p>We collect this information when you contact us using the 'contact form' on our website. We use this information to contact you about your enquiry. Our lawful basis for processing this information is our legitimate interest to reply to your message.</p> <p>We may also obtain this information from your emails when you email us regarding your services. Our lawful basis for processing this information is to perform a contract with you (i.e. to provide you with our services).</p> <p>We may retain this information on our internal client details spreadsheet. These details are never provided to any third party, and are kept only for the purposes of providing services to clients or responding to enquiries.</p>

Your credentials	Social media login details	We may ask you for your social media login details if we are providing relevant services to you. These will sometimes comprise personal data. Our lawful basis for processing this information is to perform a contract with you (i.e. to provide you with social media marketing services).
Payment details	Your card or bank details	<p>We accept invoice payments as bank transfers, and so do not collect your payment details.</p> <p>If you request and we grant a refund to you, we may request your bank or card details so that we can remit the repayment to you. We will request this information via email, and we will delete the payment details once payment has been remitted.</p> <p>Our lawful basis for processing this data is our legitimate interest in providing you with a refund.</p>
Cookies Data	Like many websites, we use "cookies" to enhance your experience and gather information about visitors and visits to our Website. Please refer to the "Do we use 'cookies'?" section below for information about cookies and how we use them and what kind.	<p>This information is necessary for us to perform our contract with you, i.e., to give you access to the service our Website provides.</p> <p>We also use this information to study how you use our Website, in order to improve and develop the services we provide, and better inform our marketing strategies.</p>
Marketing and Communications Data	Includes your preferences in receiving marketing from us and our third parties and your communication preferences.	<p>This information is necessary for our legitimate interest to present relevant content, products and services to you, including our newsletter, subscription updates and blog posts (only where you have provided your consent that we do so, by 'opting in').</p> <p>We will never market to you without your consent, and you may unsubscribe from such communications at any time.</p>

Analytics	Includes third-party analytics services (such as Google Analytics) to evaluate your use of the website, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to the website and internet usage. These third parties use cookies and other technologies to help analyse and provide us the data. By accessing and using the website, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy	This information is necessary for our legitimate interest to present relevant content, products and services to you.
-----------	---	--

We may process your data for compliance with a regulatory requirement or legal obligation to which we are subject to. Your data will only be processed if processing the data to comply with such obligation is a reasonable and appropriate way of achieving compliance.

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.

4. Third Parties

We may share your data from time to time with third parties, such as contractors who require this information to provide the service to you.

5. Information on cookies

We use cookies in accordance with applicable law and regulation.

Cookies are small text files placed on your device when you visit our site and are used to make the user's experience more efficient. We are able to store cookies on your computer where they are necessary for the operation of the site however, for non-essential cookies we need your permission.

We use cookies to distinguish users and to improve our Website. We analyse how you use our website, and we look at aggregate statistics about your usage, and how others use our Website. We collect certain information from these cookies, and this includes information about your IP address, your location when you access the Website, the date and time you access the Website, the language you use and the type of browser you use.

We do not track individual users or use cookies to identify individuals. We use cookies to recognise you and your preferences, improve our site's performance and collect analytical information for

ourselves and our business partners. Without the knowledge gained we would not be able to provide the service we do.

These are the types of cookies we use:

- 'Session cookies' allow us to track your actions during a single browsing session, but they do not remain on your device afterwards
- 'Persistent cookies' remain on your device between sessions. We use them to authenticate you and to remember your preferences. We can also use them to balance the load on our servers and improve your experience on our Website

Session and persistent cookies can be either first or third party cookies. A first party cookie is set by the Website being visited; a third party cookie is set by a different website. Both types of cookie may be used by us or our business partners.

The third party cookies we may use are:

- Google Analytics – this is a web analytics service provided by Google, Inc. The cookies used by Google Analytics help us to analyse how users use our website and to count the number of people who use it. Google Analytics stores your IP address anonymously. Google does not associate your IP address with any personally identifiable information.
- Social media retargeting (including Facebook, LinkedIn and Instagram) – third party cookies may be placed on your browser from when you click on our social media adverts or on our Website. When you next browse the internet, the cookie triggers a retargeting advert.

All our cookies are categorised by the role they fulfil on our Website:

- a. **Strictly Necessary:** these are essential to enable you to move around our Website and use features such as secure services. Without these cookies such services could not be provided;
- b. **Functionality:** allow the website to remember your choices and to personal certain features. These cookies may be anonymised and cannot track your browsing activity on other websites; and
- c. **Performance:** collect information as to how users use the Website. These cookies don't collect information that identifies a visitor. The information collected is aggregated and used to improve our Website.
- d. None of the cookies employed are classified as Behavioural Targeting.

We will always ask for your consent to use non-essential cookies. You are free to withhold consent to this, but it means that we might not be able to provide the full Website experience to you.

If at any time you wish to disable our cookies, you may do so through the settings on your browser, or whenever the pop-up appears on our Website (each time you access the Website).

6. How we store your personal data

We store all your personal data on our servers within the United Kingdom.

If we ever need to transfer your data outside the EEA or the United Kingdom, we will ensure that we have standard contractual clauses in place with these third parties before transferring data outside the EEA or the United Kingdom, and we will conduct regular due diligence on those contractors to ensure that they comply with the General Data Protection Regulation (2016/679).

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our Website. 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 will still be responsible for protection of your personal data, even where we have transferred it outside the EEA or the United Kingdom.

We regularly review our data retention obligations to ensure we are not retaining data for longer to fulfil the purposes we collected it for, including for the purposes of satisfying any legal accounting, or reporting requirements.

7. How we disclose your information

We may disclose your information in the following cases:

- If we want to sell our business, or our company, we can disclose it to the potential buyer
- We can disclose it to other businesses in our group, as defined in the Companies Act 2006
- We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety or rights
- We can exchange information with others to protect against fraud or credit risks

We may contract with third parties to supply services to you on our behalf. These include cloud services used to send emails and technology providers that assist in providing the communication to you.

8. Your legal rights

When you provide us with personal data, you have certain legal rights, and these include:

- To request access to, deletion of or correction of your personal data held by us at no cost to you
- To request that your personal data be transferred to another person (data portability)
- To be informed of what data processing is taking place
- To restrict processing
- To object to processing of your personal data
- To complain to a supervisory authority
- Right to withdraw consent

If you wish to access, rectify, erase or transfer your personal data, please contact us at samantha@redbootsmarketing.co.uk

9. What happens when we link to other websites

This privacy policy only relates to our Website. We might have links on our Website to other websites, and these websites will have their own terms and conditions and privacy policies. You should check those privacy policies before providing your personal data to those websites.

Please note that our terms and conditions and our policies will not apply to other websites that you get to via a link from our Website. We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

10. The changes we may make to this policy

We can update this policy from time to time as laws change or as the Website changes. If we make material changes to the policy, and we need your consent to those changes, we will contact you by email to do so.