

# Privacy Policy

## Introduction

This privacy notice provides you with details of how we (Hertford Picture Framing Ltd) collect and process personal data when either visiting our website ([www.hertfordpictureframing.co.uk](http://www.hertfordpictureframing.co.uk)) or becoming a prospect or customer.

From time to time, we may change the provisions of this Privacy Policy. We encourage you to review the Privacy Policy regularly to stay informed about our information practices and the ways you can help protect your privacy.

## Contact Details

**Full name of legal entity:** Hertford Picture Framing Ltd  
**Postal address:** 3 Old Cross, Hertford, Herts, SG14 1HX  
**Email address:** [info@hertfordpictureframing.co.uk](mailto:info@hertfordpictureframing.co.uk)

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would be grateful if you could contact us first if you have a complaint so that we can try to resolve it for you.

## Company background

By the nature of our business, very little personally identifiable information is required from our customers. Furthermore, we do not conduct any business directly on our website.

## What information do we collect about you?

Personal data means any information capable of identifying an individual. It does not include anonymised data.

### Information you may provide us with:

- Name
- Phone number
- Email address
- Credit card payment information

It is entirely possible for you to withhold all of the above information and still engage in business with us. To expedite your order, we would normally need some way to contact you when your order is ready for collection. However, it is acceptable for you to instead contact us after an agreed amount of time to check if your order is ready.

During your order consultation on our premises, we will take a digital photograph of the item to be framed adjacent to a mock-up of your framing requirements - this allows us to have a visual record of precisely what you agreed to. This photo will be stored on **dropbox.com** (cloud storage) and will be retained indefinitely. With this in mind, if your item contains personally identifiable information, we will obscure this information before photographing so that it is not recorded. Basic details about your order such as frame-moulding choice and order total will be recorded and also kept indefinitely, but these details are not stored with your personal information and could not be used to connect you personally with the order.

### **Information We Collect Automatically**

Our website does not use any software which gathers data by default - e.g. visitor analytics. However, we do use security tools which record suspicious activity such as “404 Page Not Found” errors or failed login attempts, as these are often associated with malicious cyber attacks. These records are kept for 60 days and will contain the IP address of the computer that triggered the suspicious activity. These IP addresses may then be used to block the computer from our website. The vast majority of our website visitors will not be affected by this data collection. We do not store any other personally identifiable information on our website.

### **Sensitive Data**

We do not collect any sensitive data about you. Sensitive data refers to data that 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.

## **How do we collect your personal data?**

We collect data about you through a variety of different methods including:

Direct interactions: You may provide data by communicating with us by post, phone, email or otherwise, including when you:

- Request a quote for our services;
- Come onboard as a customer of our services.

# How do we use your personal data?

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need it to perform the contract between us.
- 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 obligation.

## Disclosures of your personal data to others:

Your data may be shared internally, and we may have to share your personal data with the parties set out below:

- **HM Revenue & Customs** - Government
- **Google** - "Gmail" email service
- **Xero** - accounting software
- **HMS Bookkeeping Services**
- **Philip T Chave & Co** - Accountants
- **Stripe** - credit card payment processor

## Transfers of Your Personal Information Abroad

Our email system is provided by Google ("Google Apps For Business"), which is a company based in the USA. If you contact us by email or request we contact you via email, your email address will inevitably be shared with Google. Google is certified under the "EU-U.S. Privacy Shield" which is an approved part of GDPR.

If you choose to pay us by credit card (cash is also acceptable), this will be processed by Stripe, which is based in the USA, and certified under the EU-U.S. Privacy Shield.

We use Xero accounting software which is based in New Zealand. This is an approved location which complies with GDPR requirements.

## Data security

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

# Data retention

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.

In some circumstances you can ask us to delete your data: see 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

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please mail [info@hertfordpictureframing.co.uk](mailto:info@hertfordpictureframing.co.uk).

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner. More information is available at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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 a number of requests. In this case, we will notify you and keep you updated.