

PRIVACY NOTICE (GDPR)

version 1.1 (dated 2 May 2018)

This policy applies to the following business:

- Janet Groom, Writer & Wordsmith, a sole entrepreneur business, owned and operated in Switzerland, by Janet Groom
- Janet Groom, Fromattastrasse 21, 3944 Unterbäch, Switzerland

This privacy policy explains how we use any personal information we collect about you when you use our website and when subscribe to our mailing list.

Glossary of Terms

What is Personal Data?

Personal data relates to any information about a natural person that makes you identifiable which may include (but is not limited to):

- Names and contact information i.e. names, emails and, where provided, home address, and telephone numbers

What information do we collect about you and how?

We are bound by the requirements of the General Data Protection Regulations (GDPR).

You agree that we are entitled to obtain, use and process the information you provide to us to enable us to discharge the Services and for other related purposes including;

- Marketing i.e. Newsletter, other related promotional goods and services
- Analysis for business effectiveness
- Legal and regulatory compliance

We collect information about you when you fill in any of the forms on our website i.e. sending an enquiry, signing up for an event, filling in a survey, giving feedback etc. Website usage information is collected using cookies.

When submitting forms on our website we use a third-party software provider for automated data collection and processing purposes, they will not use your data for any purposes and will only hold the data in line with our policy on data retention.

Cookies are text files put on your computer to collect standard Internet log information and visitor behaviour information. This information is then used to track visitor use of the website and to create statistical reports on website activity. For more information visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. Please note in a few cases some of our website features may not function because of this.

Analytics – eg how visitors use our website

We use Google Analytics to store information about how visitors use our website so that we may make improvements and give visitors a better user experience.

Google Analytics is a third-party information storage system that records information about the pages you visit, the length of time you were on specific pages and the website in general, how you arrived at the site and what you clicked on when you were there. These cookies do not store any personal information about you eg name, address etc and we do not share the

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data. You can view their privacy policy below:

Google - <http://www.google.com/intl/en/policies/privacy/>

IP addresses

An IP or Internet Protocol Address is a unique numerical address assigned to a computer as it logs on to the Internet. We do not have access to any personal identifiable information and we would never seek this information. Your IP address is logged when visiting our site, but our analytic software only uses this information to track how many visitors we have from particular regions.

Internet Based Advertising

We use LinkedIn, Facebook and Twitter advertising services and as such there are tracking codes installed on our website so that we can manage the effectiveness of these campaigns. We do not store any personal data within this type of tracking.

1 Introduction:

- 1.1 We are committed to safeguarding the privacy of our website visitors and members of our mailing list.
- 1.2 This policy applies where we are acting as a data controller with respect to personal data of our website visitors and members of our mailing list; In other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar, as those cookies are not strictly necessary for the provision of our website and mailing list, we will ask you to consent to our use of cookies when you first visit our website, and double opt-in consent to sign up to join our mailing list.
- 1.4 Our website and marketing incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you wish to receive direct marketing communications. You may unsubscribe from the mailing list or request for your information to be removed by using the Unsubscribe option on the regular newsletter email or by emailing the data controller direct with your removal request janet@janetgroom.com.

2 How we use your personal data

- 2.1 In this Section 2 we have set out:
 - a) the general categories of personal data that we may process;
 - b) the purpose for which we may process personal data; and
 - c) the legal bases of processing.
- 2.2 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, timing, frequency and pattern of your service use). This usage data may be processed for the purposes of analyzing the use of the website and services. The legal basis for this processing is consent when using the website and is for our legitimate interests, namely monitoring and improving our website and services.
- 2.3 When you sign up to join receive our newsletter, your email and name will be collected and added to our mailing list for use only by Janet Groom for direct marketing purposes. The newsletter will be sent out on a monthly basis and will include updates, links and other related promotional information.

3 Providing your personal data to others

- 3.1 We will not disclose or share your personal data with any other third parties, without your direct consent. The personal data you supply will only be used by Janet Groom business, as described above.
- 3.2 Cookies used by our service providers: use of cookies by services providers; Google Analytics cookies; Google AdSense cookies; service provider cookies (Siteground.com)
- 3.3 We may disclose your personal data to insurers or professional legal advisors in the event of legal proceedings, insurance claim or court proceedings.
- 3.4 Your personal details will also be disclosed to our accountant in relation to any purchase of goods or services as a client of the business.

4 International transfers of your personal data

- 4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 4.2 Your personal data will only be used in the country where the business is located, currently Switzerland and UK.
- 4.3 The hosting facility for our website are situated in United States of America (Siteground.com); and safeguarded under the standard data protection clauses approved by the European Commission.

5 Retention of Personal Data

- 5.1 Your personal data will be retained for a period minimum period of six years from sign up to the mailing list, with a periodical review after three years. You may unsubscribe at any time from the mailing list or request your personal details to be removed with immediate effect.
- 5.2 In some cases it is not possible for us to specify retention period for cookies relating to the website.
- 5.3 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6 Amendments

- 6.1 We may update this policy from time to time by publishing a new version which will be available on our website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy notice.
- 6.3 We may notify you of changes to this policy by direct email or notification on our website.

7 Your rights

- 7.1 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 name, as listed on our records and current address).
- 7.2 We may withhold personal information that you request to the extent permitted by law.
- 7.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 7.4 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 the use of your personal information for marketing purposes.
- 7.5 If you feel that your personal data has been processed in a way that does not meet the GDPR, you have the right to lodge a complaint with the relevant supervisory authority.

8 How to contact us

- 8.1 Please contact us if you have any questions about our privacy policy or information we hold about you:
 - By email: janet@janetgroom.com
 - By post: Janet Groom, Writer & Wordsmith, Frommattastrasse 21, 3944 Unterbäch, Switzerland