



Actually Data Limited

Privacy Policy

17 May 2018

Background:

Actually Data Limited understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits Our Site and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and Our obligations under the law.

This Policy applies to Our use of any and all data collected by us. Please read this Privacy Policy carefully and ensure that you understand it.

1. Definitions and Interpretation

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

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Our Site”	means this website actuallydata.com
“We/Us/Our”	means Actually Data Ltd a company registered in England and Wales (Company No. 9604275) Registered Office: 3 Milestone Road London SE19 2LL

2. Information About Us

2.1 Our Site, actuallydata.com is owned by Actually Data Ltd a company registered in England and Wales (Company No. 9604275) Registered Office: 3 Milestone Road London SE19 2LL

2.2 Our data protection officer is Anthony Fawkes who can be contacted at our registered address.

3. Scope – What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. It does not extend to any websites that

are linked to from Our Site (whether We provide those links or whether they are shared by other users). 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.

4. **What Data Do We Collect?**

No data will be collected automatically by Our Site, other data will only be collected if you voluntarily submit it and consent to Us using it for the purposes set out in section 5, for example, when signing up for an Account.

5. **How Do We Use Your Data?**

5.1 All personal data is stored securely in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR). For more details on security see section 6, below.

5.2 We use your data to provide the best possible services to you. This includes:

5.2.1 Providing and managing your Account;

5.2.2 Supplying Our services to you;

5.2.3 Personalising and tailoring Our services for you;

5.2.4 Responding to communications from you.

5.3 In some cases, the collection of data may be a statutory or contractual requirement, and We will be limited in the [products and] services We can provide you without your consent for Us to be able to use such data.

5.4 We will not send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.

5.5 Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis applies:

a) you have given consent to the processing of your personal data for one or more specific purposes;

b) processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract;

c) processing is necessary for compliance with a legal obligation to which we are subject;

d) processing is necessary to protect the vital interests of you or of another natural person;

e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or

processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject

is a child.

6. How and Where Do We Store Your Data?

- 6.1 We only keep your data for as long as We need to in order to use it as described above in section 5, and/or for as long as We have your permission to keep it. In any event, We will conduct an annual review to ascertain whether we need to keep your data. Your data will be deleted if we no longer need it in accordance with the terms of our Data Retention Policy
- 6.2 Your data will only be stored within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein).
- 6.3 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 Site.
- 6.4 Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet.

7. Do We Share Your Data?

- 7.1 We may contract with third parties to supply services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 7.2 In certain circumstances We may be legally required to share certain data held by Us, which may include your personal information, for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us.

8. What Happens If Our Business Changes Hands?

- 8.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Data provided by users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by Us.
- 8.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes

9. **How Can You Control Your Data?**

- 9.1 When you submit information you may be given options to restrict Our use of your data. We aim to give you strong controls on Our use of your data (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details.
- 9.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

10. **Your Right to Withhold Information and Your Right to Withdraw Information After You Have Given it**

- 10.1 You may access Our Site without providing any data at all
- 10.2 You may withdraw your consent for Us to use your personal data as set out in section 5 at any time by contacting Us using the details set out in section 15, and We will delete Your data from Our systems. However, you acknowledge this may limit Our ability to provide the best possible services to you.

11. **How Can You Access Your Data?**

You have the legal right to ask for a copy of any of your personal data held by Us (where such data is held). Please contact Us for more details at enquiries@actuallydata.co.uk

12. **Summary of Your Rights under GDPR**

Under the GDPR, you have:

13.1 the right to request access to, deletion of or correction of, your personal data held by Us;

13.2 the right to complain to a supervisory authority;

13.3 be informed of what data processing is taking place;

13.4 the right to restrict processing;

13.5 the right to data portability;

13.6 object to processing of your personal data;

13.7 rights with respect to automated decision-making and profiling (see section 14 below).

To enforce any of the foregoing rights or if you have any other questions about Our Site or this Privacy Policy, please contact Us using the details set out in section 15 below.

13. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at enquiries@actuallydata.co.uk or by post at our registered address below. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 11, above).

14. **Changes to Our Privacy Policy**

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. 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 alterations. We recommend that you check this page regularly to keep up-to-date.