

Privacy policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors, service users and individual customers.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications. You can access the privacy controls via www.starttothrive.me/blog
- 1.4 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

2. Credit

- 2.1 This document was created using a template from Docular (<https://seqlegal.com/free-legal-documents/privacy-policy>).

3. The personal data that we collect

- 3.1 In this Section 3 we have set out the general categories of personal data that we process.
- 3.2 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers. The source of the contact data is you.
- 3.3 We may process information relating to transactions, including purchases of goods and/or services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your name, your contact details, your payment card details (or other payment details) and the transaction details. The source of the transaction data is you.
- 3.4 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.
- 3.5 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, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

4. Purposes of processing and legal bases

- 4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 4.2 **Operations** - We may process your **contact data, transaction data communication data, usage data** for the purposes of operating our website, providing our services, generating invoices, bills and other payment-related documentation. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business.
- 4.3 **Publications** - We may process testimonials and recommendations for the purposes of publishing such data on our website and elsewhere through our services in accordance with your express instructions. The legal basis for this processing is consent.
- 4.4 **Relationships and communications** - We may process **contact data transaction data** and/or **communication data** for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our website visitors, service users, individual customers, the maintenance of relationships, and the proper administration of our website, services and business.
- 4.5 **Direct marketing** - We may process **contact data**, for the purposes of creating, targeting and sending direct marketing communications by email. The legal basis for this processing is our legitimate interests, namely [promoting our business and communicating marketing messages and offers to our website visitors and service users.
- 4.6 **Research and analysis** - We may process **usage data** for the purposes of researching and analysing the use of our website and services. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our website, services and business generally.
- 4.7 **Record keeping** - We may process your **contact data, transaction data communication data, usage data** for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally]. The legal basis for this processing is our legitimate interests, namely [ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.
- 4.8 **Security** - We may process your **contact data, transaction data communication data, usage data** for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.

- 4.9 **Insurance and risk management** - We may process your **contact data, transaction data communication data, usage data** where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 4.10 **Legal claims** - We may process your **contact data, transaction data communication data, usage data** where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 4.11 **Legal compliance and vital interests** - We may also process your personal data where such processing 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.

5. Providing your personal data to others

- 5.1 We may disclose your **contact data, transaction data communication data** to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.
- 5.2 Financial transactions relating to our services may be handled by our payment services providers, *Starling Bank and PayPal*. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at
- <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>
- <https://www.starlingbank.com/legal/privacy-notice/>
- 5.3 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure 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. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6. International transfers of your personal data

- 6.1 In this Section 6, we provide information about the circumstances in which your personal data may be transferred to countries outside the United Kingdom and the European Economic Area (EEA).

- 6.2 The hosting facilities for our website are situated in Israel, Brazil, Canada, Germany, India, Ireland, Lithuania, the United States, and Ukraine. The competent data protection authorities have made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the competent data protection authorities, a copy of which you can obtain from <https://www.wix.com/about/privacy>
- 6.4 You acknowledge that testimonials and recommendations that you submit for publication through our website may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

7. Retaining and deleting personal data

- 7.1 This Section 7 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 7.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 We will retain your personal data as follows:
- (a) contact data will be retained for a minimum period of 12 months following the date of the most recent contact between you and us, and for a maximum period of 4 years following that date;
 - (b) account data will be retained for a minimum period of 12 months following the date of closure of the relevant account, and for a maximum period of 4 years following that date;
 - (c) transaction data will be retained for a minimum period of 12 months following the date of the transaction, and for a maximum period of 4 years following that date;
 - (d) communication data will be retained for a minimum period of 12 months following the date of the communication in question, and for a maximum period of 4 years following that date;
 - (e) usage data will be retained for 12 months following the date of collection; and
- 7.4 Notwithstanding the other provisions of this Section 7, 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.

8. Your rights

- 8.1 In this Section 8, we have listed the rights that you have under data protection law.

8.2 Your principal rights under data protection law are:

- (a) **the right to access** - you can ask for copies of your personal data;
- (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) **the right to erasure** - you can ask us to erase your personal data;
- (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
- (e) **the right to object to processing** - you can object to the processing of your personal data;
- (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
- (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
- (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

8.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

8.4 You may exercise any of your rights in relation to your personal data [by written notice to us, using the contact details set out below].

9. About cookies

9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

9.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

10. Cookies that we use

10.1 We use cookies for the following purposes:

- (a) **authentication and status** - we use cookies [to identify you when you visit our website and as you navigate our website (cookies used for this purpose are):
- (b) **security** - we use cookies as an element of the security measures used to protect our website and services generally (cookies used for this purpose are):
- (c) **analysis** - we use cookies to help us to analyse the use and performance of our website (cookies used for this purpose are):

Cookie Name	Purpose	Duration	Cookie Type
XSRF-TOKEN	Used for security reasons	Session	Essential
hs	Used for security reasons	Session	Essential
svSession	Used in connection with user login	2 years	Essential
SSR-caching	Used to indicate the system from which the site was rendered	1 minute	Essential
_wixCIDX	Used for system monitoring/debugging	3 months	Essential
_wix_browser_sess	Used for system monitoring/debugging	session	Essential
consent-policy	Used for cookie banner parameters	12 months	Essential
smSession	Used to identify logged in site members	Session	Essential

TS*	Used for security and anti-fraud reasons	Session	Essential
bSession	Used for system effectiveness measurement	30 minutes	Essential
fedops.logger.sessionId	Used for stability/effectiveness measurement	12 months	Essential
wixLanguage	Used on multilingual websites to save user language preference	12 months	Functional

11. Managing cookies

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you will not be able to use all the features on our website.

12 Amendments

12.1 We may update this policy from time to time by publishing a new version on our website.

12.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

13. Our details

13.1 This website is owned and operated by Start to Thrive Ltd.

14.2 We are registered in England and Wales under registration number 12389176, and our registered office is at 9 Morton Avenue, Kidlington, Oxford OX5 1BS.

14.3 Our principal place of business is at 9 Morton Avenue, Kidlington, Oxford OX5 1BS

14.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website; or
- (d) by email, using the email address published on our website.