

## Privacy Policy

### We Love Privacy and We Respect It.

Strength Behind the Strong understands that your privacy is important to you and that you care about how your personal data is used. I respect and value the privacy of everyone who visits this website, [www.strengthbehindthestrong.co.uk](http://www.strengthbehindthestrong.co.uk) ("My Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with my obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy [is deemed to occur upon your first use of my Site] **AND/OR** [You will be required to read and accept this Privacy Policy when signing up for an Account]. If you do not accept and agree with this Privacy Policy, you must stop using my Site immediately.

#### 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 my Site;

##### **"Cookie"**

means a small text file placed on your computer or device by my Site when you visit certain parts of my Site and/or when you use certain features of my Site. Details of the Cookies used by my Site are set out in Part 14, below; and

##### **["Cookie Law"**

means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;]

#### 1. Information About Me

My Site is [owned and] operated by Sharon Bristow

#### 1. What Does This Policy Cover?

This Privacy Policy applies only to your use of the Site. My Site may contain links to other websites. Please note that I have no control over how your data is collected, stored, or used by other websites and I advise you to check the privacy policies of any such websites before providing any data to them.

#### 1. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 1. What Are My Rights?

Under the GDPR, you have the following rights, which I will always work to uphold:

1. The right to be informed about my collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact me to find out more or to ask any questions using the details in Part 15.
2. The right to access the personal data I hold about you. Part 13 will tell you how to do this.
3. The right to have your personal data rectified if any of your personal data held by me is inaccurate or incomplete. Please contact me using the details in Part 15 to find out more.
4. The right to be forgotten, i.e. the right to ask me to delete or otherwise dispose of any of your personal data that I have. Please contact me using the details in Part 15 to find out more.
5. The right to restrict (i.e. prevent) the processing of your personal data.
6. The right to object to me using your personal data for a particular purpose or purposes.
7. The right to data portability. This means that, if you have provided personal data to me directly, I am using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask me for a copy of that personal data to re-use with another service or business in many cases.
8. Rights relating to automated decision-making and profiling. I do not use your personal data in this way.

For more information about my use of your personal data or exercising your rights as outlined above, please contact me using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about my use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.

## 1. What Data Do We Collect?

Depending upon your use of my Site, I may collect some or all of the following personal [and non-personal] data (please also see Part 14 on my use of Cookies and similar technologies):

- [Name;]

- [Date of birth;]
  - [Gender;]
  - [Address;]
  - [Email address;]
  - [Telephone number;]
  - [Payment information;]
  - [IP address];
  - [A list of URLs starting with a referring site, your activity on the Site, and the site you exit to;]
1. How Do You Use My Personal Data?

Under the GDPR, I must always have a lawful basis for using personal data. This may be because the data is necessary for my performance of a contract with you, because you have consented to my use of your personal data, or because it is in my legitimate business interests to use it. Your personal data [will] **OR** [may] be used for [one of] the following purposes:

- [Providing and managing your Account;]
- [Providing and managing your access to [my Site;]
- [Personalising and tailoring your experience on my Site;]
- [Supplying [our] **OR** [my] [products] **AND/OR** [services] to you. Your personal details are required in order for [us] **OR** [me] to enter into a contract with you.]
- [Personalising and tailoring [our] **OR** [my] [products] **AND/OR** [services] for you.]
- [Communicating with you. This may include responding to emails or calls from you.]
- [Supplying you with information by [email] **AND/OR** [post] that you have opted-in to (you may unsubscribe or opt-out at any time using the unsubscribe button at the bottom of each newsletter/email).]
- [Analysing your use of [Our] **OR** [My] Site [and gathering feedback] to enable [us] **OR** [me] to continually improve [Our] **OR** [My] Site and your user experience.]

[With your permission and/or where permitted by law, [we] **OR** [I] may also use your personal data for marketing purposes, which may include contacting you by [email] **AND/OR** [telephone] **AND/OR** [text message] **AND/OR** [post] with information, news, and offers on [our] **OR** [my] [products] **AND/OR** [services]. You will not be sent any unlawful marketing or spam. [We] **OR** [I] will always work to fully protect your rights and comply with [our] **OR** [my] obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.]

[[We] **OR** [I] use the following automated system[s] for carrying out certain kinds of [decision-making] **AND/OR** [profiling]. If at any point you wish to query any action that [we] **OR** [I] take on the basis of this or wish to request ‘human intervention’ (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives you the right to do so. Please contact [us] **OR** [me] to find out more using the details in Part 15.

1. How Long Will You Keep My Personal Data?

**[We] OR [I]** will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

1. How and Where Do You Store or Transfer My Personal Data?

**[[We] OR [I]** will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.]

**OR**

**[[We] OR [I]** will only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.]

**OR**

**[[We] OR [I]** may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that **[we] OR [I]** will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

**[[We] OR [I]** share your data within the group of companies of which **[we are] OR [I am]** a part. Where this involves the transfer of personal data outside the EEA, **[our] OR [my]** group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the [European Commission](#).]

**OR**

**[[We] OR [I]** share your data with external third parties, as detailed below in Part 10, that are based outside of the EEA. The following safeguard[s] **[is] OR [are]** applied to such transfers:

**[[We] OR [I]** will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection. More information is available from the [European Commission](#).]

**OR**

**[[We] OR [I]** use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the GDPR. More information is available from the [European Commission](#).]

## AND/OR

[Where [we] **OR** [I] transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).]]

Please contact [us] **OR** [me] using the details below in Part 15 for further information about the particular data protection mechanism used by [us] **OR** [me] when transferring your personal data to a third country.]

### 1. Do You Share My Personal Data?

[[We] **OR** [I] will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, [we] **OR** [I] may be legally required to share certain personal data, which might include yours, if [we are] **OR** [I am] involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.]

[If any personal data is transferred outside of the EEA, [we] **OR** [I] will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 9.]

In some limited circumstances, [we] **OR** [I] may be legally required to share certain personal data, which might include yours, if [we are] **OR** [I am] involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.]

### 1. How Can I Control My Personal Data?

- In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via [Our] **OR** [My] Site, you may be given options to restrict [our] **OR** [my] use of your personal data. In particular, [we] **OR** [I] aim to give you strong controls on [our] **OR** [my] use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from [us] **OR** [me] which you may do by unsubscribing using the links provided in [our] **OR** [my] emails [and] **OR** [,] at the point of providing your details [and by managing your Account]).
- 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.

### 1. Can I Withhold Information?

You may access [certain areas of] [Our] **OR** [My] Site without providing any personal data at all. [However, to use all features and functions available on [Our] **OR** [My] Site you may be required to submit or allow for the collection of certain data.]

## 1. How Can I Access My Personal Data?

If you want to know what personal data [we] **OR** [I] have about you, you can ask [us] **OR** [me] for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. [To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell [us] **OR** [me] everything [we] **OR** [I] need to know to respond to your request as quickly as possible.]

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover [our] **OR** [my] administrative costs in responding.

[We] **OR** [I] will respond to your subject access request within 7 working days and, in any case, not more than] one month of receiving it. Normally, [we] **OR** [I] aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date [we] **OR** [I] receive your request. You will be kept fully informed of [our] **OR** [my] progress.

## 1. How Do You Use Cookies?

[[Our] **OR** [My] Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by [us] **OR** [me] and are used only by [us] **OR** [me]. [We] **OR** [I] use Cookies to facilitate and improve your experience of [Our] **OR** [My] Site and to provide and improve [our] **OR** [my] [products] **AND/OR** [services]. [We] **OR** [I] have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on [Our] **OR** [My] Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling [us] **OR** [me] to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of [Our] **OR** [My] Site may not function fully or as intended. [You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.]

[Certain features of [Our] **OR** [My] Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that [Our] **OR** [My] Site may not work properly if you do so. [We] **OR** [I] have taken great care to ensure that your privacy is not at risk by allowing them.]

The following first-party Cookies may be placed on your computer or device:

[Our] OR [My] Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling [us] OR [me] to better understand how [Our] OR [My] Site is used. This, in turn, enables [us] OR [me] to improve [Our] OR [My] Site and the [products] AND/OR [services] offered through it.

The analytics service(s) used by [Our] OR [My] Site use(s) Cookies to gather the required information. You do not have to allow [us] OR [me] to use these Cookies, however whilst [our] OR [my] use of them does not pose any risk to your privacy or your safe use of [Our] OR [My] Site, it does enable [us] OR [me] to continually improve [Our] OR [My] Site, making it a better and more useful experience for you.

The analytics service(s) used by [Our] OR [My] Site use(s) the following Cookies:

In addition to the controls that [we] OR [I] provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

#### 1. How Do I Contact You?

To contact [us] OR [me] about anything to do with your personal data and data protection, including to make a subject access request, please use the following details [(for the attention of Sharon Bristow)]:

Email address: [strengthbehindthestrong@gmail.com](mailto:strengthbehindthestrong@gmail.com)

#### 1. Changes to this Privacy Policy

[We] OR [I] may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if [we] OR [I] change [our] OR [my] business in a way that affects personal data protection.

Any changes will be immediately posted on [Our] OR [My] Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of [Our] OR [My] Site following the alterations. [We] OR [I] recommend that you check this page regularly to keep up-to-date.

This Privacy Policy was last updated on 8<sup>th</sup> April 2020