# **Privacy Notice**

This Privacy Notice describes our policy with respect to information that can be associated with or which relates to a person and/or could be used to identify a person ("Personal Data").

Janice Tullock Associates provides a range of activities on a freelance basis to organisations and individuals. Archival work, consultancy, consultation, historical research and genealogy involves uncovering personal information about your customers, potential customers, staff and former staff. This Privacy Policy sets out what happens to any personal data that you provide or that is collected from you. The Privacy Policy is updated as necessary in line with the Data Protection Act, 1998.

As the owner of Janice Tullock Associates, I, Janice Tullock, am the Data Controller (as registered with the Information Commissioners Office, reference: ZA600159) for this business. All Personal Data is processed and stored securely, for no longer than is necessary in light of the reason for which it was first collected. I will comply with my obligations and safeguard your rights under the data protection legislation at all times.

My use of your personal data will always have a lawful basis, either because it is necessary for my performance of a contract with you, because you have consented to my use of your personal data (e.g. by subscribing to emails), or because it is in my legitimate interests. Specifically, I may use your data for the following purposes:

- Providing and managing your access to Our Site;
- Personalising and tailoring your experience on Our Site;
- Supplying Our services to you (please note that We require your Personal Data in order to enter into a contract with you);
- Personalising and tailoring Our services for you;
- Replying to emails from you;
- Market research; and
- Analysing your use of Our Site to enable Us to continually improve Our Site and your user experience.

With your permission and/or where permitted by law, I may also use your data for marketing purposes which may include contacting you by email, telephone and post with information, news and offers on my services. I will not, however, send you any unsolicited



marketing or spam and will take all reasonable steps to ensure that I fully protect your rights and comply with my obligations under the data protection legislation.

You have the right to withdraw your consent to me using your personal data at any time, and to request that I delete it.

Information held on third parties may include names, email addresses, postal addresses and telephone numbers which come from one source, namely: clients' names and contacts details provided to me by the individuals concerned in respect of commissioned research.

I may sometimes contract with third parties to supply services to you on my behalf. These may include sub-contractors, accountants, payment processing, 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, I will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, my obligations, and the obligations of the third party under the law. Anonymised data may be shared with sub-contractors also working on a relevant project, following client agreement. Data collected during consultation processes is anonymised, unless the respondent has provided me with consent for it to be shared.

# Storage provision and security

Contacts details of clients are stored electronically on my work computer/laptop/mobile phone as well as on an external hard drive, used as a backup medium and on my online backup system (Dropbox). Details are also held in written form on hard copy (paper) e.g. contract agreements. Electronic records are kept secure by password protection mechanisms. Written records are kept in a locked filing cabinet to protect from theft, fire and water. On rare occasions data might be transported on a flash drive which is encrypted. All reasonable measures are taken to keep all records secure and up to date.

I only keep your personal data for as long as I need to in order to use it as described in any communication with you, and/or for as long as I have your permission to keep it.

I will store some of your personal data in the UK. This means that it will be fully protected under the UK's Data Protection Legislation.



Sometimes, I will store some of 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 EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

I may also store some or all of your personal data in countries outside of the UK and EEA. These are known as "third countries". We 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 data protection legislation data security is very important to me, and to protect your data I have taken suitable measures to safeguard and secure data collected.

Steps I take to secure and protect your data include:

- All devices and computers that we store your data on are password protected;
- All devices and computers that we store your data have anti-virus software and are constantly updated to the most recent operating system; and
- I only store your data on computers and devices owned by me. I also use contractors who may store my data on their computers, servers and any such cloud storage they may access. I will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, my obligations, and the obligations of the third party under the law.

# Subject access request/data amendment

Any data held on an individual can be accessed by application to me as Data Controller. An acknowledgement of the request will usually be given within 2 working days of the request having been received. Provision of data will be actioned on verification of the individual's identity and by their method of choice within 7 working days of the request having been acknowledged. This process also applies to requests for data to be destroyed.

#### **Your Rights**

As a data subject, you have the following rights under the data protection legislation, which this policy and my use of personal data have been designed to uphold:

The right to be informed about my collection and use of personal data;

- The right of access to the personal data I hold about you;
- The right to rectification if any personal data I hold about you is inaccurate or incomplete;
- The right to be forgotten i.e., the right to ask me to delete any personal data I hold about you (I only hold your personal data for a limited time, but if you would like me to delete it sooner, please contact me
- The right to restrict (i.e., prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- The right to object to me using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.

If you have any cause for complaint about my use of your personal data, please contact me by email to: janice@janicetullock.co.uk and I will do my best to solve the problem for you. If I am unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

#### **COOKIES NOTICE**

This website may place and access certain first party cookies on your computer or device. First party cookies are those placed directly by me and are used only by me. We use cookies to facilitate and improve your experience of this website and to provide and improve services. 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 this website are used in accordance with current cookie law. I may use some or all of the following types of cookie:

Strictly Necessary Cookies

A cookie falls into this category if it is essential to the operation of this website, supporting functions such as logging in, your shopping basket, and payment transactions.

Analytics Cookies



It is important for me to understand how you use this website, for example, how efficiently you are able to navigate around it, and what features you use.

#### **Functionality Cookies**

Functionality cookies enable me to provide additional functions to you on this website such as personalisation and remembering your saved preferences. Some functionality cookies may also be strictly necessary cookies, but not all necessarily fall into that category.

#### **Targeting Cookies**

Targeting cookies help to better understand you and, in turn, to make a website and advertising more relevant to your interests. We do not currently use any targeting cookies on this website.

#### Persistent Cookies

Any of the above types of cookies may be a persistent cookie. Persistent cookies are those which remain on your computer or device for a predetermined period and are activated each time you visit this website.

#### Session Cookies

Any of the above types of cookies may be a session cookie. Session cookies are temporary and only remain on your computer or device from the point at which you visit this website until you close your browser. Session cookies are deleted when you close your browser.

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 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 this website 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 this website depend on cookies to function. Cookie law deems these Cookies to be "strictly necessary". 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 this

website may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first and third party cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
_GRECAPTCHA	This third party cookie is set by the Google recaptcha service to identify bots to protect the website against malicious spam attacks.	Yes
elementor	This first party cookie is used by the website's WordPress theme. It allows the website owner to implement or change the website's content in real-time.	Yes

Our Site doesn't currently use any analytics services. Website analytics refers to a set of tools used to collect and analyse anonymous usage information.

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 this website 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.

### Contact

If you have any questions or would like to know more about the data I hold about you, please complete the contact form at <a href="www.janicetullock.co.uk">www.janicetullock.co.uk</a>

### Retention Period

All information is held for a period of seven years to comply with the legal requirements of reporting to HM Revenue and Customs department for tax purposes. Providing there are no investigations or audits required, any data dating from eight years prior and no longer being used in connection with current project work, will be destroyed.

The data protection policy confirms my commitment to

- protecting your personal data
- ensuring personal data it is up to date and accurate
- ensuring personal data is secure
- ensuring clear processing of data in respect of its collection and use
- adhering to the use of personal data only in respect of professional activities
- adhering to a data protection policy which is fair, lawful and proportionate
- retaining personal data and records for 7 years to fulfil legal compliance obligations
- processing data requests within seven working days

The transmission of information via the internet is not completely secure and therefore I cannot guarantee the security of data sent to me electronically, therefore transmission of such data is entirely at your own risk.



