

Website privacy policy (GDPR)

...

1. [Important information and who we are](#)
2. [The data we collect about you](#)
3. [How is your personal data collected?](#)
4. [How we use your personal data](#)
5. [Disclosures of your personal data](#)
6. [International transfers](#)
7. [Data security](#)
8. [Data retention](#)
9. [Your legal rights](#)
10. [Glossary](#)

INTRODUCTION

Welcome to CoventGate Law's privacy notice.

CoventGate Law respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. [Alternatively you can download a pdf version of the policy here [LINK]]. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. [IMPORTANT INFORMATION AND WHO WE ARE]
2. [THE DATA WE COLLECT ABOUT YOU]
3. [HOW IS YOUR PERSONAL DATA COLLECTED]
4. [HOW WE USE YOUR PERSONAL DATA]

5. [DISCLOSURES OF YOUR PERSONAL DATA]

6. [INTERNATIONAL TRANSFERS]

7. [DATA SECURITY]

8. [DATA RETENTION]

9. [YOUR LEGAL RIGHTS]

10. [GLOSSARY]

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how of your personal data) until May 2018 as we are still working towards getting our systems ready for some of these changes.]

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

By filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you [DELETE OR ADD TO THIS LIST AS APPROPRIATE]:

1. apply for our products or services;
2. create an account on our website;
3. subscribe to our service or publications;
4. request marketing to be sent to you;
5. enter a competition, promotion or survey; or
6. give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. [We may also receive Technical Data about you if you visit other websites employing our cookies.] Please see our cookie policy [LINK] for further details].

Third parties or publicly available sources. We may receive personal data about you from various third parties [and public sources] as set out below [DELETE OR ADD TO THIS LIST AS APPROPRIATE]:

Technical Data from the following parties:

- (a) analytics providers [such as Google based outside the EU];
- (b) advertising networks [such as [NAME] based [inside OR outside] the EU]; and
- (c) search information providers [such as [NAME] based [inside OR outside] the EU].

Contact, Financial and Transaction Data from providers of technical, payment and delivery services [such as [NAME] based [inside OR outside] the EU].

Identity and Contact Data from data brokers or aggregators [such as [NAME] based [inside OR outside] the EU].

If you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest

To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)

	(b) Necessary to comply with a legal obligation
...	

[by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or] by [Contacting us](#) at any time].

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of [a product/service purchase, warranty registration, product/service experience or other transactions].

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [LINK TO YOUR COOKIE POLICY.]

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

[European Commission: Model contracts for the transfer of personal data to third countries.](#)

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please [Contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

[Details of retention periods for different aspects of your personal data are [available in our retention policy which you can request from us by [Contacting us](#) OR set out in the table in paragraph 4 above].

OR

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for [six] years after they cease being customers for [tax] purposes.]

In some circumstances you can ask us to delete your data: see [Request erasure] below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

1. [Request access to your personal data].
2. [Request correction of your personal data].
3. [Request erasure of your personal data].
4. [Object to processing of your personal data].
5. [Request restriction of processing your personal data].
6. [Request transfer of your personal data].
7. [Right to withdraw consent].

If you wish to exercise any of the rights set out above, please [Contact us](#) OR [INSERT SPECIFIC DETAILS OF WHO TO CONTACT FOR SUBJECT ACCESS RIGHTS]].

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a fee if that is charged to us.