

# The **i**ndispensary.

## Privacy Policy and Cookie Policy

### **Background:**

The Indispensary 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 in relation to your use of Our Site. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

### **1. Definitions and Interpretation**

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

<b>"Account"</b>	means an account required to access and/or use certain areas and features of Our Site;
<b>"Cookie"</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in, below;
<b>"Our Site"</b>	means this website, <a href="http://www.theindispensary.co.uk">www.theindispensary.co.uk</a>
<b>"UK and EU Cookie Law"</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015;
<b>"We/Us/Our"</b>	Means The Indispensary Limited, Limited Company No 14762047 whose registered address C/O GX Accountancy & Bookkeeping Services 1 Fortescue Court, Thorverton, Exeter, Devon, England, EX5 5JN

## 2. Information About Us

- 2.1 Our Site, [www.theindispensary.co.uk](http://www.theindispensary.co.uk), is owned and operated The Indispensary Limited T/A Joanne Manville Virtual Assistance, Limited Company No 14762047 whose registered address C/O GX Accountancy & Bookkeeping Services 1 Fortescue Court, Thorverton, Exeter, Devon, England, EX5 5JN
- 2.2 The Data Protection Lead is Joanne Manville, Director, who can be contacted at [joanne.manville@theindispensary.co.uk](mailto:joanne.manville@theindispensary.co.uk).

## 3. Scope – What Does This Policy Cover?

- 3.1 This Privacy Policy applies only to your use of Our Site. It does not extend to any websites linked to Our Site (whether we provide those links or whether other users share them). 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?

- 4.1 Some data will be collected automatically by Our Site, and other data will only be collected if you voluntarily submit it and consent to us using it for the purposes set out below, for example, when signing up for an Account. Depending upon your use of Our Site, we may collect some or all of the following data:

Data	Reason	Location
name;	General contact VA expression of interest	<a href="#">Join Our Team</a>
contact information such as email addresses and telephone numbers;	General contact VA expression of interest	<a href="#">Join Our Team</a>
IP address (automatically collected);	General contact VA expression of interest	Cookies - all pages, if consented
web browser type and version (automatically collected);	General contact VA expression of interest	Cookies - all pages, if consented
a list of URLs starting with a referring site, your activity on Our Site, and the Site you exit to (automatically collected);	VA expression of interest	<a href="#">Join Our Team</a>  Cookies - all pages, if consented
business/company name;	Testimonial VA expression of interest	<a href="#">Join Our Team</a>
job title;	Testimonial	<a href="#">Join Our Team</a>

	VA expression of interest	
profession;	Testimonial VA expression of interest	<a href="#">Join Our Team</a>
demographic information such as postcode, preferences and interests;	VA expression of interest	<a href="#">Join Our Team</a>
operating system (automatically collected);	VA expression of interest	<a href="#">Join Our Team</a>

## 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) and the Data Protection Act 2018.
- 5.2 We use the data collected on Our Site to provide the best possible services to you. This may include:
- 5.2.1 Providing and managing your access to Our Site;
  - 5.2.2 Responding to communications from you;
  - 5.2.3 Supplying you with email, e.g. newsletters, alerts etc. that you have subscribed to (you may unsubscribe or opt-out at any time by clicking 'unsubscribe' in the newsletter);
  - 5.2.4 Engage associates to work with clients
  - 5.2.5 Analysing your use of Our Site and gathering feedback to enable us to continually improve Our Site and your user experience;
- 5.3 In some cases, the collection of data may be a statutory or contractual requirement, and we will be limited in the services. We can provide you without your consent for us to be able to use such data.
- 5.4 With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by
- email
  - telephone
  - text message
  - post with information, news and offers on our services.

We will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the UK Data Protection Legislation (DPA 2018) and the Privacy and Electronic Communications (EC Directive) Regulations 2003, the latest version updated 2019.

- 5.5 Under UK Data Protection Legislation (DPA 2018), we will ensure that your data is processed lawfully, fairly, and transparently without adversely affecting your rights. We will only process your 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
- f) processing is necessary for the purposes of the legitimate interests pursued by a third party or by us, 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.

5.6 This policy is for the use of the website only. When working with us, we will issue you with a copy of our Data Protection Policy for details in regards to how we process your data.

## **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](#), and/or for as long as We have your permission to keep it. In any event, we will conduct a review in accordance with our Data Retention Policy 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 We aim to store all data within the UK or EEA. Some or all of your data may be stored or transferred outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein).

6.3 Where any information, from the use of this site, is stored outside of the UK, you will be asked for explicit consent. If we do store or transfer data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the UK Data Protection Legislation (DPA 2018).

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. 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 products and services to you on our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. Data shared with third parties will only be necessary for the requirements that they need, for as long as required. 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 We may compile statistics about the use of Our Site, including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. Data will only be shared and used within the bounds of the law.
- 7.3 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 UK Data Protection legislation, (DPA 2018) 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** From time to time, we may expand or reduce our business, which 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 we originally collected it.
- 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. When contacted, you will, however, be given the choice to have your data deleted or withheld from the new owner or controller.

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

- 9.1** When you submit information via Our Site, 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 or by contacting Joanne Manville, Director at [joanne.manville@theindispensary.co.uk](mailto:joanne.manville@theindispensary.co.uk).
- 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 from receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receive.

## **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 restrict your internet browser's use of Cookies.
- 10.3** You may withdraw your consent for us to use your data at any time by contacting us. However, you acknowledge this may limit our ability to provide the best possible services to you.
- 10.4** We will delete your data from our systems upon request, or as set out within our Retention Schedule.

## 11. How Can You Access Your Data?

11.1 You have the legal right to ask for a copy of any of your data held by us (where such data is held). Please contact us for more details at [joanne.manville@theindispensary.co.uk](mailto:joanne.manville@theindispensary.co.uk) or using the contact details below.

## 12. What Cookies Do We Use and What For?

12.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those set directly by us and are used only by us. We use Cookies to facilitate and improve our Site's experience and provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.

12.2 By using Our Site you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. We use third-party Cookies on Our Site for analysing website traffic. These Cookies are not integral to the functioning of Our Site.

12.3 All Cookies used by and on Our Site are used in accordance with current English and EU Cookie Law.

12.4 Before any 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 enable us to provide the best possible experience and service. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

12.5 Certain features of Our Site depend on Cookies to function. UK and EU Cookie Law deems these Cookies to be "strictly necessary". Your consent will not be sought to place these Cookies. You may still block these Cookies by changing your internet browser's settings as detailed below, but please be aware that Our Site may not work as intended if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

12.6 Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to understand better how people use Our Site. This, in turn, enables us to improve Our Site and the services offered through it. You do not have to allow us to use these Cookies, as detailed below; however, whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.

12.7 The analytics service(s) used by Our Site use(s) Cookies to gather the required information. The analytics service(s) used by Our Site use(s) the following Cookies:

Name	Analytics/domain	To identify your unique session on the website.
------	------------------	---

_ga	Google Analytics	To calculate visitor, session, campaign data and keep track of site usage for the Site's analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors
_gid	Google Analytics	To store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number of visitors, the source where they have come from, and the pages visited in an anonymous form
1 month_gat	Google Analytics	To throttle the request rate to limit the collection of data on high traffic sites
IDE	DoubleClick.net	DoubleClick will let advertisers control how often an ad is shown to a browser, how long it is shown for and how often it will appear.
<u>RUL</u>	DoubleClick.net	DoubleClick will let advertisers control how often an ad is shown to a browser, how long it is shown for and how often it will appear.

12.8 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. Please consult the help menu in your internet browser or the documentation that came with your device for further details.

12.9 You can choose to delete Cookies 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.

12.10 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.

### **13. Summary of Your Rights under UK Data Protection Legislation, (DPA 2018)**

13.1 Under The Data Protection Act, you have:



- the right to request access to, deletion of or correction of, your personal data held by us;
- the right to complain to a supervisory authority;
- be informed of what data processing is taking place;
- the right to restrict processing;
- the right to data portability;
- object to the processing of your personal data;
- rights with respect to automated decision-making and profiling

13.2 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 [below](#).

## 14. Contacting Us

14.1 If you have any questions about Our Site or this Privacy Policy, please contact us by email at [joanne.manville@theindispensary.co.uk](mailto:joanne.manville@theindispensary.co.uk), by telephone on 07814 218142, or by post c/o GX Accountancy and Bookkeeping Services, 1 Fortescue Court, Thorverton, Exeter, Devon EX5 5JN. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

## 15. Changes to Our Privacy Policy

15.1 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.

### This Policy has been approved and authorised by:

**Name:** Joanne Manville

**Position:** Director, Owner

**Date:** 8<sup>th</sup> April 2024

**Due for Review by:** 8<sup>th</sup> April 2025

**Signature:**

