

**Nanny Brow website privacy notice to
comply with General Data Protection
Regulations (GDPR) which come into
force on 25th May 2018**

Written 19/05/18 by MH /SR for review in 12 months' time.

Privacy Notice

This is the privacy notice of PJ and SM Robinson LLP trading as Nanny Brow. In this document, "we", "our", or "us" refer to PJ and SM Robinson LLP trading as Nanny Brow.

We are company number 0C350138 registered in England.

Our registered office is at Nanny Brow, Clappersgate, Ambleside, LA22 9NF.

Introduction

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
5. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
6. The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided on our website at www.nannybrow.co.uk
7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

1. Information we process because we have a contractual obligation with you

When you create an account on our website, buying a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- 1.1. verify your identity for security purposes
- 1.2. sell products to you
- 1.3. provide you with our services
- 1.4. provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

2. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists except when the information is required for VAT purposes which we are legally required to store information for 7 years.

You may withdraw your consent at any time by instructing us info@nannybrow.co.uk. However, if you do so, you may not be able to use our website or our services further.

3. Information we process because we have a legal obligation

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant, court order or police to identify overseas travellers for passport regulations.

This may include your personal information.

Specific uses of information you provide to us

4. Information provided on the understanding that it will be shared with a third party

Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- 4.1. posting a message on our guest Facebook page, Nanny Brow Facebook page, Twitter and Instagram etc.
- 4.2. tagging an image
- 4.3. clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at info@nannybrow.co.uk.

5. Complaints regarding content on our website

Our website is a publishing medium. Anyone may register and then publish information about himself, herself or some other person.

We do not moderate or control what is posted.

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

6. Information relating to your method of payment

We store information about your debit or credit card or other means of payment when you first provide it to us.

We also store it to help us prevent fraud.

We take the following measures to protect your payment information:

- 6.1. We keep your payment information encrypted on our servers.
- 6.2. We do not keep all your payment information so as:
 - 6.2.1 to prevent the possibility of our duplicating a transaction without a new instruction from you;
 - 6.2.2 to prevent any other third party from carrying out a transaction without your consent.
 - 6.2.3 We store your debit or credit card information in accordance with PCI-DSS regulations.
- 6.3. Access to your payment information is restricted to authorised staff only.
- 6.4. If we ask you questions about your payment information, we only show partial detail OR the first four OR the last four digits of the debit or credit card number, so that you can identify the means of payment to which we refer.

7. Job application and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

8. Sending a message to our support team

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

9. Complaining

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

Use of information we collect through automated systems when you visit our website

10. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- 10.1. to track how you use our website
- 10.2. to record whether you have seen specific messages we display on our website
- 10.3. to keep you signed in our site

Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

11. Our use of re-marketing

We may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

Disclosure and sharing of your information

12. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

13. Credit reference

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

14. Data may be processed outside the European Union

Our websites are hosted in England.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly, data obtained within the UK or any other country could be processed outside the European Union.

For example, some of the software our website uses may have been developed in the United States of America or in Australia.

Access to your own information

15. Access to your personal information

15.1. At any time, you may review or update personally identifiable information that we hold about you, by signing in to your account on our booking system.

15.2. To obtain a copy of any information that is not provided on our booking system you may send us a request at info@nannybrow.co.uk.

15.3. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

16. Removal of your information

If you wish us to remove personally identifiable information from our booking system, you may contact us at info@nannybrow.co.uk.

This may limit the service we can provide to you.

17. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Other matters

18. Use of site by children

- 18.1. We do not sell products or provide services for purchase by children, nor do we market to children.
- 18.2. If you are under 18, you may use our website only with consent from a parent or guardian. No booking are accepted by anyone under the age of 18.
- 18.3. We collect data about all users of and visitors to these areas regardless of age, and we anticipate that some of those users and visitors will be children.
- 18.4. Such child users and visitors will inevitably visit other parts of the site and will be subject to whatever on-site marketing they find, wherever they visit.

19. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

20. How you can complain

- 20.1. If you are not happy with our privacy policy or if you have any complaint, then you should tell us by email. Our address is info@nannybrow.co.uk.
- 20.2. If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- 20.3. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

21. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 21.1. to provide you with the services you have requested;
- 21.2. to comply with other law, including for the period demanded by our tax authorities;
- 21.3. to support a claim or defence in court.

22. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

23. Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.

The EU Data Protection Directive (95/46/EC), implemented as the General Data Protection Regulation, or the GDPR, comes into force from May 2018.

In the UK, the Data Protection Bill enshrines the law in the GDPR, making it applicable even after the UK leaves the European Union.

Identification of the owner of the website

Under GDPR we are required to identify the business or the organisation that operates the website. This is PJ & SM Robinson LLP, Nanny Brow, Clappersgate, Nr Ambleside, Cumbria. LA22 9NF. The website is hosted in the UK. Our Data Protection Officer is Susan Robinson.

Introduction

Leave these items in place unless there is a good reason to edit or remove. Each of these items has been carefully considered in the context of this document and has been included for a purpose.

1. This paragraph sets out the purpose of the document and explains terms used throughout it.
2. If a visitor is not happy with your privacy policy, there is little he or she can do except leave your website. This paragraph reminds him or her of that recourse.
3. This is a statement of intent, designed to reassure visitors, but also any regulator.
4. As above.
5. This statement demonstrates awareness of the GDPR and compliance. It should also reassure visitors.
6. A key requirement of the law is that you tell your visitors and customers that they have rights with respect to how their personal information is processed. Rather than cluttering your privacy notice with an explanation of the law, we recommend referring your visitors to this explanatory website.
7. A statement designed to reassure site visitors.

The bases on which we process information about you

A requirement of the GDPR is that you tell the data subject why you process the data and which legal basis you have chosen to use as the justification to process his or her data.

Most websites will process different types of data on different bases. The two most likely to apply are “Contract” (after the visitor has accepted your terms and conditions) and “Consent” (after the visitor has agreed to your use of his or her data – usually by taking some affirmative action such as clicking on a button). Some data may also be processed because of a legal requirement.