

Privacy Policy

This Data Privacy and Data Protection Policy refers to information (The Data) we obtain about individuals (The Data Subjects) and the use we make of it (The Data Processing) in accordance with the European General Data Protection Regulations (GDPR) the Data Protection Act 2018 (DPA) the Privacy & Electronic Communications

Regulations 2003 (PECR) and associated relevant Data Protection statutes and Regulations.

Disclaimer

The website may from time to time include information or opinions relating to Avon Cosmetics Ltd. The statements, views and opinions made or expressed on this website are not made by or on behalf of Avon Cosmetics Ltd.

Whilst we endeavour to ensure that the content of our website is accurate and up-to-date, we do not make any representations nor give any warranties of any kind (express or implied) with respect to the contents or operation of this website, and any such representations and warranties are expressly excluded.

This website is made available on the basis that (except in respect of fraud or of death or personal injury caused by our negligence), all liability whatsoever for any losses, claims, actions or damage, whether direct or indirect, arising out of or in connection with your use of this website, or your reliance upon the contents of this website, are excluded to the fullest extent permitted by law including but not limited to any liability for computer service or system failure, access delays or interruption, data non delivery or mis-delivery, computer viruses or other harmful components, breaches of security or unauthorised use of the system arising from “hacking” or otherwise.

We do not warrant that use of this website will be uninterrupted and error free.

If we discover any typographical, clerical or other error or omission in any page posted on this website then such error shall be subject (as soon as practicable) to correction or deletion (as appropriate) without any liability on our part.

We reserve the right to make changes to this website and these Terms and Conditions at any time without notice and it is your responsibility to revisit this page from time to time to re-read this notice.

Any revised terms shall take effect as at the date of its posting on this website.

The content of this website, any dispute arising out of this website, and your relationship with us are governed by English law and shall be subject to the exclusive jurisdiction of the English Courts.

This policy was last updated on 21 July 2020

Online Privacy Policy

1. Overview

- 1.1. This Privacy Policy applies when you visit our or use our website. Further Privacy Policy statements and documents may apply offline and these are available, if relevant, on request.
- 1.2. This site is owned by Evelyn & Reg Halsall whose business address is 17 Raybrook Crescent Swindon Wiltshire SN2 2HR.
- 1.3. We are the 'data controller' of any personal information you provide to us.
- 1.4. We are registered as a Data controller with the Information Commissioners Office our registration number is: **ZA165550**
- 1.5. As a Data Controller, we will take all the necessary steps to comply with the GDPR and Data Protection Act 2018 and relevant subordinate legislation when handling any personal data which you may provide to us.

This includes ensuring that data is:

- i) Fairly and lawfully processed
 - ii) Processed for limited purposes
 - iii) Adequate, relevant and not excessive
 - iv) Accurate and Secure;
 - v) Not kept longer than necessary
 - vi) Processed in accordance with your rights
 - vii) Not transferred to countries outside the European Economic Area.
- 1.6. We are committed to protecting and respecting your privacy when visiting our website and providing us with your personal information and this privacy policy statement summarises what personal details we may collect from you before, during or after you use our site and what we will do with them.
 - 1.7. We use Video Conferencing in the general course of our business during which we may collect personal details and to ensure your privacy we will:
 - i) Provide you with specific log in details and specific times for each session.
 - ii) Ensure all participants are aware of other participants attending the same session.
 - iii) Confirm in advance if the session is being recorded.
 - iv) Recorded Sessions will not be stored for more than 30 days.

- v) Prevent Access to unauthorised attendees and control access to protect the security of attendees.
- vi) Control the issue of passwords and access to the session.
- vii) During your Video Conference, we will only collect personal information that you choose to provide.
- viii) If you share other people's data with us you will need to check that they consent to you providing their information to us.

We are committed to protecting and respecting your privacy when attending a Video Meeting and providing us with your personal information and this privacy policy statement summarises what personal details we may collect from you before, during or after you attend such a meeting and what we will do with them.

1.8. To contact us use the postal address above or you can email us at evelynandreg@makesalesfromhome.co.uk if you have any queries regarding this policy.

1.9. This Online Privacy information is a precis of our detailed written policies which are held at our business premises. Please contact us if you require further information regarding our data protection compliance procedures.

1.10. We will review and update this Privacy Policy from time to time and all changes will be posted to this page.

2. Our privacy policy and data protection policies:

2.1. We are committed to protecting your personal privacy and, in accordance with relevant data protection laws, we uphold strict security procedures for the collection, storage, use and disclosure of your personal information.

2.2. We have described below the personal information we may gather about you, the purposes we will hold it for and the limited categories of people to whom we may disclose it.

3. What information do we collect and how may we use it?

3.1. All visitors to the site:

3.2. During your visit to our site, we will only collect personal information that you choose to provide, if for example you: contact us with an enquiry or request us to provide you with further information

3.3. If you share other people's data with us, for example if you order on behalf of another company, you will need to check that company consents to you providing their information to us.

4. We may use the information held about you in the following ways:

- 4.1. To administer any account you have with us
- 4.2. To perform our contractual obligations to you
- 4.3. To respond to your queries and requests
- 4.4. To communicate with you
- 4.5. To ensure that the content of our site is presented in the most effective manner
- 4.6. To provide you with the information, products and services requested from us
- 4.7. To provide you with helpful information about our products or services
- 4.8. To make improvements to the service we provide you
- 4.9. We also reserve the right to disclose your personal information where we are required to do so by law, such as to assist in any disputes, claims or investigations relating to your account or contract with us, and to detect and prevent fraudulent transactions.
- 4.10. E-mail correspondence with Ourselves via our website and email addresses accessible through, or obtained from, this site may be recorded and/or monitored.

5. How do we store and protect your data?

- 5.1. We take the security of your information seriously and we will endeavour to ensure that the personal information you submit to us is kept private and secure.
- 5.2. Data we receive and process is held by us in secure electronic devices and separate back up devices and servers.
- 5.3. Personal Data may also be held in encrypted 3rd party 'Cloud' Servers.
- 5.4. We will not sell, rent or otherwise disclose the personal information you provide to us through the site to third parties (other than as listed below) unless we are required to do so by law.

6. Third parties who provide services on our behalf

- 6.1. We may share your personal information with certain third parties who provide services on our behalf.
- 6.2. Such 3rd Parties only have access to the personal information they need to perform those services.
- 6.3. Such 3rd parties are bound by contractual arrangements with Ourselves and are required to keep your personal information secure and confidential. They may only use it as permitted by us in accordance with this Privacy Policy.

- 6.4. If you have contracted with us we will share data only to the extent necessary for the performance of the contract, otherwise we will obtain specific consent from you before sharing your data.
- 6.5. The third parties who provide services on our behalf fall into the following categories:
 - i) Our partners providing logistics and external service support.
 - ii) Our business partners or advisors for the purposes of completing or investigating a transaction with you. E.g. Avon Cosmetics.
 - iii) Marketing agencies appointed to provide services to us
 - iv) Accountants, auditors, law firms, payment processors, information technology support providers

7. How long do we store your data?

- 7.1. We will not keep your data for longer than is necessary for the relevant purposes and timescales set out in our Company Compliance Policy.
- 7.2. Where you have purchased a product or service from us, we will hold your relevant personal details to enable us to provide after-sales services and to administer the contract.

8. Your rights

- 8.1. Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data.
- 8.2. You have the right to request from us access to and rectification or erasure of your personal data; the right to restrict processing; the right to object to processing as well as in certain circumstances the right to data portability.

Please note we will retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

- 8.3. 3. To exercise any of these rights contact us at the address above or by email as below.

9. Lawful bases for data processing

- 9.1. We hold and process your data by lawfully allowed means, these include:
 - i) **Your Consent:** Consent is usually given by yourself when you contact us via the Website or personally when we discuss products or advice with you.
 - ii) **Contractual obligations:** This occurs when you purchase products or services from us.
 - iii) **Legal Obligation:** When the processing is necessary for us to comply with the Law.

- iv) **Vital Interests:** When the processing is necessary to protect someone's life.
- v) **Public Task:** When the processing is necessary for us to perform a task in the public interest or for an official function and the task or function has a clear basis in Law.
- vi) **Legitimate Interests:** When the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

10. Children's data

- 10.1. Our site is not directed at children and should not be accessed by them. We will not knowingly collect information from minors without their parent's or guardian's consent.

11. Third Party Websites

- 11.1. From time to time our site may contain links to and from the websites of our suppliers or other third party sites.
- 11.2. If you visit any of these sites please note they have their own privacy policies and you should check these before submitting any personal data. We cannot accept any responsibility or liability for these policies.

12. Data Access

- 12.1. You have rights of access to the data we hold about you. Should you wish to exercise these rights our Data Protection Manager is Mr Reg Halsall, who you may contact via the address above.
- 12.2. There is no charge for this service. As soon as we are satisfied as to your identity, we will send you, within one Month a copy of all the data we hold relating to you.
- 12.3. Please contact us if you believe that any personal data or information which we hold about you is incorrect or incomplete. Any information or data which is found to be incorrect will be corrected as soon as practicable.
- 12.4. Please contact us if you wish to have your personal data removed entirely from our systems. As soon as we are satisfied as to your identity and the data is not required to be kept for any other lawful reason or purpose it will be removed from our systems forthwith. If you so wish, your Data is provided to you electronically in a commonly used format such as email.
- 12.5. If you are unhappy with any of the responses given to you by us you may complain about us to the regulator at the Information Commissioners Office on 0303 123 1113 or through their website www.ico.org.uk.

13. Changes to this policy.

- 13.1. There may be developments in how we use your data according to changes in the Law.
- 13.2. We reserve the right to make changes to this Data Protection and Privacy Policy at any time without notice and it is your responsibility to revisit this page from time to time to re-read this policy.
- 13.3. Any revised terms shall take effect as at the date of posting.
- 13.4. If you don't find your concern addressed here, feel free to contact us by e-mailing us at
evelynandreg@makesalesfromhome.co.uk