



## Privacy Notice

This privacy notice explains what, how and why we collect information when you visit [www.FocusedForBusiness.com](http://www.FocusedForBusiness.com), [interact with us](#) or [use our services](#). It also explains how we use and process the information.

Hatty Fawcett trading as Focused For Business is the data controller and is responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

Contact details:

Hatty Fawcett, Focused For Business

Email: [hatty@FocusedForBusiness.com](mailto:hatty@FocusedForBusiness.com)

Postal address: 3 Hill Road, Swanage, Dorset, BH19 1RH

### 1. The types of data we collect about you

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process the following categories of personal data about you, depending on how you interact with us:

Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us.

Customer Data that includes data relating to any purchases of goods and/or services such as your name, title, billing address, email address, phone number, contact details and order information and history.

Technical Data that includes data about the use of our website and online services such as IP addresses, details about your browser, length of visit to pages, page views and navigation paths, time zone settings and other technology on the devices you use to access our website although we are unable to identify you directly from this information (see the section below regarding cookies that explains how our analytics work).

Marketing Data that includes contact details for you, typically your name and email address and any other information you may input into your marketing profile or marketing preferences.

We may use Customer Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts, LinkedIn adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you.



### **Special Category Data**

We do not collect any Special Category Data about you. Special category data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We also do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

### **2. How we collect and use your personal data and the basis on which we process it**

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. This section sets out how we use your data and why.

#### **Visitors to our website**

Cookies. We use cookies and similar technology (e.g. pixel tracking) on our website to analyse trends, administer the website, to track users' movements around the website and, on occasion, to serve targeted advertisements:

- Google Analytics. When someone visits our website we make use of the Google Analytics service to collect standard information about visitors to the sites and their behaviour (e.g. what pages they viewed). The data provided by Google Analytics is anonymised and in no way enables us to identify individual visitors, however, Google Analytics will place a cookie on your device to enable the service. For more information about how Google Analytics cookies work on websites visit: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>
- Facebook Pixel. We also make use of Facebook pixels for the purposes of measuring the effectiveness of our marketing campaigns and to also serve our advertising via the Facebook



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advertising network. Before we make use of these technologies via the website you will be prompted to provide consent to their use. If you do not consent to their use then we will not make use of these pixels and will not be able to measure the effectiveness or provide our marketing messaging to you.

- Third-party cookies. We also make use of some third-party plugins and services via our website which may also place cookies on your device when you visit our website. These cookies do not enable the service or us to identify you from the use of the cookie:
  - AddThis social sharing widget
  - Twitter (for the embedded Twitter feed)

If you want to take control of what cookies we use, most web browsers allow cookie controls through their settings. You can find out more about cookies, including how to see what cookies have been set via <https://www.aboutcookies.org> or <http://www.allaboutcookies.org>. However, please note that if you do not allow cookies whilst using our website the functionality and your use of your site will be significantly impacted. We also provide a cookie banner on our website so you can opt-in to non-essential cookies.

Hosting. Our website is hosted with a third-party hosting provider, but they do not have any access to our website and the website does not store any personal information.

#### **If you contact us**

If you contact us by email your email will be stored via our email provider and also downloaded into an email application running on our computers. Any personal data you provide will be used depending on the nature of your email and will be kept in our email for as long as it is lawful for us to do so (for example, if you become a client we may keep your emails as part of our client records for both contractual and legal obligation purposes).

If you contact us by phone we may record details of our conversation for the purposes of follow-up or in accordance with the nature of your enquiry.

#### **If you sign up for one of our services**

If you use one of our services, we will process your data for the purposes of providing the service to you. We will also use your name and email to add you to our newsletter (see below). It is lawful for us to do this as you are taking our funding clinic services. You can opt-out at any time via the unsubscribe link in the emails you receive or by contacting us directly.

Funding Clinics. If you sign up for one of our funding clinics we will ask you for the following information: name, email (and the email address of anyone else you wish to invite) and mobile phone number. You may also provide us with information about your company name and your location (town, county/state and country) but this optional. We use a third-party service to provide the booking form (and calendar)



and so your details will be processed via this third-party. The information you provide will be used to facilitate the funding clinic but will also be used to provide a calendar invite to us both, and as such will be processed by our online calendar provider. We will also receive email confirmation of your booking of a clinic.

Reports and resources via Scoreapp. If you complete one of our questionnaires via a Scoreapp page, we will use the information you provide in the questionnaire to provide you with your report and to follow-up with you. As this service is provided by a third-party (Scoreapp) they will process your data for the purposes of providing us with your information so we can deal with your request.

**If you receive our marketing communications (e.g. our newsletter)**

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business). Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time. We do not share your personal data with any third parties for their own marketing purposes. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at [Hatty@FocusedForBusiness.com](mailto:Hatty@FocusedForBusiness.com).

**If you sign-up to one of our seminars (via Eventbrite)**

From time to time we run online seminars. If you sign-up to join one of these then you will do so via the Eventbrite platform. Eventbrite will collect the minimal amount of information needed to provide you with details of the event and to notify us and allow us to communicate with you about the event.

We may also use your data to invite you to such seminars by providing your details to Eventbrite for the purposes of sending you an invite to the event. You can ask us not to contact you in this way at any time, by emailing us at [Hatty@FocusedForBusiness.com](mailto:Hatty@FocusedForBusiness.com).

**If you interact with us via social media**

We don't actively target people on social media, but if you do reach out to us via a social media channel then we will usually engage with you via the same channel, unless we arrange a call or we provide you with our email address, so you can email us directly.



### **If you are a supplier or contractor**

If you are one of our suppliers we will collect the minimal information about you and your services as required to make use of your services and deal with invoices and payments for your services. Such information will be stored within our accounting package for the purposes of our accounts and will be retained accordingly.

We may also retain your contact details within our email application or via business cards that you may provide to us, for the purposes of contacting you in the future should we need your services.

### **3. Disclosure of your personal data**

Generally, we will not share your personal data, but may do so to the following:

- Service providers who provide IT, marketing and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- Government bodies that require us to report processing activities.
- Partners who deliver our services on our behalf.
- Third parties to whom we may sell, transfer, or merge parts of our business or our assets.

In all cases where we are using a third-party service or company, we will only provide the minimal amount of information for the purposes of delivering the service to us and to meet our requirements.

We always carry out due diligence against all our third-party suppliers, who are considered Data Processors, for the purposes of ensuring their compliance with data protection, maintaining adequate security of your data and ensuring they apply adequate data protection principles to the processing of the data we supply. We also make sure a legally binding contract (sometimes called a Data Processing Agreement or DPA) is also in place to protect your data.

### **4. International transfers**

As a business, we operate in the UK. However, we may make use of third-party services (as set out above) that may involve a transfer of your data outside the UK. Whenever we transfer your personal data out of the UK, we will always make sure appropriate safeguards are in place. This means we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data or where there is a data processing contract in place (the "standard contractual clauses").

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

### **5. Data security**



We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

## 6. Data retention

Unless stated elsewhere in this document, we will only retain your personal data for as long as it is lawful for us to do so, such as it being necessary to fulfil the purposes we collected it for, or for satisfying any legal, accounting, or reporting requirements. When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements. For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers. In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 7. Your legal rights

Under data protection laws you have rights in relation to your personal data that include the right to:

- Request access to your personal data (the “subject access” right)
- Request the correction of your personal data (e.g. if it is incorrect or needs updating)
- Request erasure of your personal data that we no longer need
- Request restriction of processing
- Object to processing,
- Request transfer or a machine-readable export of your personal data
- Withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individualrights/>

If you wish to exercise any of the rights set out above, please email us at [Hatty@FocusedForBusiness.com](mailto:Hatty@FocusedForBusiness.com). 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 reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to



ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

You also have the right to complain about the way we are using your data. You have the right to complain to the Information Commissioner’s Office (ICO) in their capacity as the UK supervisory authority for data protection issues (<https://ico.org.uk/make-a-complaint/>). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

### 8. 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.

### 9. More information

For more information about your data rights and privacy or data protection in general visit the Information Commissioner’s Office website: <https://ico.org.uk>

### 10. Changes to our privacy notice

We may change or update elements of this privacy notice from time to time or as required by law. The most current version of our privacy notice is available on our website at <https://focusedforbusiness.com/wp-content/uploads/2018/05/Privacy-Notice-Focused-For-Business-2018.pdf>

### 11. Document control

Version	Date	Author	Status	Comments
v1.0	2018	Hatty Fawcett	FINAL	First version
v2.0	11/03/21	Mark Gracey GDPR	UPDATED	New version to include more data subject information about processing activity

**Commented [MG1]:** This document control section doesn't need to be published with your privacy policy, but you are expected to keep proper document control and archived copies of previous versions (that are dated)