

# PRIVACY POLICY

Victoria Reed, Party Squared is committed to protecting the rights and freedoms of data subjects and safely and securely processing their data in accordance with all of our legal obligations. We hold personal data about our, clients, suppliers and other individuals for a variety of business purposes.

This policy sets out how we seek to protect personal data and ensure that we understand the rules governing their use of the personal data to which we have access.

## Definitions

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Business purposes	<p>The purposes for which personal data may be used by us:</p> <p>Personnel, administrative, financial, regulatory, payroll and business development purposes.</p> <p>Business purposes include the following:</p> <ul style="list-style-type: none"><li>- Compliance with our legal, regulatory and corporate governance obligations and good practice</li><li>- Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests</li><li>- Ensuring business policies are adhered to</li><li>- Operational reasons, such as recording transactions and quality control</li><li>- Marketing our business</li><li>- Improving services</li></ul>
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Personal data	<p>'Personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified</p> <p>Personal data we gather may include: individuals' phone number, email address, bank details.</p>
Processing	<p>'Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, use, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.</p>

## Scope

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We may supplement or amend this policy by additional policies and guidelines from time to time.

Victoria Reed has overall responsibility for the day-to-day implementation of this policy. You should contact the Victoria Reed for further information about this policy if necessary.

Email: [victoria@partysquared.co.uk](mailto:victoria@partysquared.co.uk) | Tel: 07913 166697

## The principles

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Victoria Reed, Party Squared shall comply with the principles of data protection (the Principles) enumerated in the EU General Data Protection Regulation. We will make every effort possible in everything we do to comply with these principles. The Principles are:

1. Lawful, fair and transparent - Data collection must be fair, for a legal purpose and we must be open and transparent as to how the data will be used.
2. Limited for its purpose - Data can only be collected for a specific purpose.
3. Data minimisation - Any data collected must be necessary and not excessive for its purpose.
4. Accurate - The data we hold must be accurate and kept up to date.
5. Retention - We cannot store data longer than necessary.
6. Integrity and confidentiality - The data we hold must be kept safe and secure.

### 1.1 Accountability and transparency

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We must ensure accountability and transparency in all our use of personal data. We must show how we comply with each Principle.

### 1.2 Fair and lawful processing

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We must process personal data fairly and lawfully in accordance with individuals' rights. This generally means that we should not process personal data unless the individual whose details we are processing has consented to this happening.

If we cannot apply a lawful basis (explained below), our processing does not conform to the first principle and will be unlawful. Data subjects have the right to have any data unlawfully processed erased.

### 1.3 Lawful basis for processing data

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Our lawful basis for processing your data is shown below. At least one of the following conditions apply whenever we process your personal data:

1. Consent: We hold recent, clear, explicit, and defined consent for the individual's data to be processed for a specific purpose.
2. Contract: The processing is necessary to fulfil or prepare a contract for the individual.

## 2. What data we hold and why?

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- The purpose of the data processing is to provide you with a service or product under contract
- Without processing your data, we cannot provide you with a contract for our services

We must also ensure that individuals whose data is being processed by us are informed of the lawful basis for processing their data, as well as the intended purpose. This should occur via a privacy notice. This applies whether we have collected the data directly from the individual, or from another source.

### 3.1 Data collected stored and processed

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- Data is sourced directly from you, either when you first contact us by email, or when you contact us via our website. It is also occasionally sourced from you if we have met you at a wedding fair or venue open day. When you contact us, we will reply and make our privacy policy available to you.
- Your data is processed in order for us to prepare a quotation or to prepare or fulfil a contract with you.
- The data we collect and store, includes; your name, address, phone number and email address. It also includes the address your event will be held at for delivery purposes and calculating delivery charges for quotations.
- Where a security deposit has been paid for a hire order, we ask for your bank account number and sort-code. This is taken in order for us to refund the security deposit. The details and taken used to make the refund and are immediately destroyed after use.
- Recipients of your personal data are Apple and Dropbox, Google and Wix. Orders contracts and photographs are stored in cloud storage. Email service is provided by Gmail and our site is hosted by Wix. Wix and Google collect your

IP address and information about the device you are using for the purposes of analysing site traffic and information about customers including; sex, age and location.

- We retain data for a period of one year after your event to fulfil business, tax and legal requirements.
- If you feel your data is being processed incorrectly or without consent you have the right to lodge a complaint with the ICO

### 3.2 Special categories of personal data

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We do not need to collect and do not store the following information:

- race
- ethnic origin
- religion
- genetics
- health
- sexual orientation

### 3.3 Access requests

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We must provide an you with a copy of the information if you request it, free of charge. This must occur without delay, and within one month of receipt. We endeavour to provide you access to your information in commonly used electronic formats.

### 3.4 Right to erasure

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You have a right to have your data erased and for processing to cease in the following circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected and / or processed
- Where consent is withdrawn
- Where the individual objects to processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed or otherwise breached data protection laws
- To comply with a legal obligation
- The processing relates to a child

We can only refuse to comply with a right to erasure in the following circumstances:

- The exercise or defence of legal claims

## 4. Accuracy and relevance

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- We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained.
- Individuals may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform Victoria Reed.

## 5. Data retention

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We must retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each client and event.

### 5.1 Rights of individuals

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You have the right to understand how and why we use your personal data.

#### 1. Right to be informed

- This privacy policy is intended to be concise, transparent, intelligible and easily accessible.
- The policy shows a record of how we use personal data.

#### 2. Right of access

- You can access your personal data and information we hold about you and your event by contacting Victoria Reed by email on [victoria@partysquared.co.uk](mailto:victoria@partysquared.co.uk)

#### 3. Right to rectification

- We must rectify or amend your personal data immediately if it is inaccurate or incomplete.

#### 4. Right to erasure

- We must delete or remove your data if requested and provided there is no compelling reason for its continued processing.

#### 5. Right to restrict processing

- We must comply with any request to restrict, block, or otherwise suppress the processing of personal data.
- We are permitted to store personal data if it has been restricted, but not process it further. We must retain enough data to ensure the right to restriction is respected in the future.

#### 6. Right to object

- We must respect your right to object to data processing based on legitimate interest or the performance of a public interest task.
- We must respect your right to object to direct marketing, including profiling

### 6.1 Our responsibilities

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- We fully understand our data protection obligations
- We check that any data processing activities we are dealing with comply with our policy and are justified
- We do not use data in any unlawful way
- We do not store data incorrectly, be careless with it
- We comply with this policy at all times
- We will raise any concerns/ notify any breaches or errors, and report anything suspicious without delay
- We will review all data protection procedures and policies on a regular basis
- We will ensure all systems, services, software and equipment meet acceptable security standards
- We check and scan security hardware and software regularly to ensure it is functioning properly
- We research third-party services, such as cloud services the company is using to store or process data

### 6.2 Storing data securely

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Your personal data is kept secure against loss or misuse. All possible technical measures are used to keep data secure.

- Data printed on paper, is kept in a locked filing cabinet at our business address
- Printed data is shredded when it is no longer needed
- Data stored on a computer should be protected by password manager created passwords that are changed regularly
- We store data and back up data to Dropbox and Apple clouds
- Data is not stored directly on mobile devices or memory sticks

### 6.3 Reporting breaches

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Any breach of this policy or of data protection laws must be reported as soon as practically possible and as soon as we are aware of a breach. Victoria Reed, Party Squared has a legal obligation to report any data breaches to our supervisory authority within 72 hours.

If you have any questions or concerns about anything in this policy, do not hesitate to contact Victoria Reed.