

Pixooma Ltd – Privacy Policy

We at Pixooma Ltd understand that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of our Clients and everyone else who visits this website, www.pixooma.co.uk (“our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

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:

“**Client**” means any business to which we provide our services;

“**Cookie**” 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 clause 10; and

“**We/Us/Our**” means Pixooma Ltd, a company registered in England and Wales under number 08954582, whose registered office address is 1 The Bank, Kettering Road, Kettering, Northamptonshire, NN14 1PJ.

2. What Does This Policy Cover?

2.1 This Privacy Policy explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

2.2 Visitors to our Site should note that it may contain links to other websites, such as social media links. Please note that 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.

3. What Is Personal Data?

3.1 Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as “any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier”.

3.2 Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

3.3 The personal data that we collect is set out in clause 5, below.

4. Your Rights

4.1 Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

4.1.1 The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in clause 11.

4.1.2 The right to access the personal data we hold about you. Clause 8 will tell you how to do this.

4.1.3 The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in clause 11 to find out more.

4.1.4 The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in clause 11 to find out more.

4.1.5 The right to restrict (i.e. prevent) the processing of your personal data.

4.1.6 The right to object to us using your personal data for a particular purpose or purposes.

4.1.7 The right to withdraw consent. This means that if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.

4.1.8 The right to data portability. This means that if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

4.1.9 Rights relating to automated decision-making and profiling.

4.2 It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

4.3 Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

4.4 If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in clause 11.

5. What Data Do We Collect and How Do We Use Your Data?

5.1 We may collect, use, store, and transfer different kinds of personal data which we have grouped together as follows:

5.1.1 **Identity Data** includes first name, last name, title, username or similar identifier. You may give us this information about you by filling in forms on our website or by corresponding with us by phone or email.

5.1.2 **Contact Data** includes addresses, billing addresses, email addresses, and telephone numbers. We collect this data when you first become our Client or on various other occasions when you make contact with us (or when we need to contact you) and as we provide our services to you.

5.1.3 **Financial Data** includes bank account and card payment details.

5.1.4 **Transaction Data** includes details about payments to and from you, and other details of the services provided to you.

5.1.5 **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Site. We automatically collect this information through Cookies as set out in clause 10.

5.1.6 **Profile Data** includes your interests, preferences, feedback and survey responses.

- 5.1.7 **Usage Data** includes information about how you use our Site and our services. Again, we automatically collect this information through Cookies as set out in clause 10.
- 5.1.8 **Marketing and Communications Data** includes your preferences in receiving marketing from us and third parties, and your communication preferences.
- 5.2 We do not collect any “special category” or “sensitive” personal data or personal data relating to children or data relating to criminal convictions and/or offences.
- 5.3 All personal data is processed and stored securely, for no longer than is necessary or statutorily required in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the applicable Data Protection Legislation at all times. For more details on security see clause 6, below.
- 5.4 Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:

Purpose/Activity	Type of Data	Lawful basis for processing	Personal Data Retention
To commence working with you as a new or returning Client	(a) Identity (a) Contact	Performance of a contract with you	6 years from the date our contract terminates or expires with you
To deliver our services including: (a) Managing payments, fees and charges (b) Collecting and recovering money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (b) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)	6 years from the date our contract terminates or expires with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how Clients use our services)	6 years from the date our contract terminates or expires with you
To conduct marketing activities and make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Profile (d) Usage (d) Marketing and Communications	Necessary for our legitimate interests (to study how Clients use our services, to develop them and grow our business)	2 years from the date we received your Personal Data
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (e) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation	2 years from the date we received your Personal Data
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how Clients use our services, to develop them, to grow our business and to inform our marketing strategy)	2 years from the date we received your Personal Data
To administer competitions we may run from time to time	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to grow our business and to inform our marketing strategy)	1 year from the date we received your Personal Data

- 5.5 Please be aware that as a Client, if you upload or provide us with access to the personal data of any other person, it is your responsibility to obtain permission from those persons to do so and you will remain the Data Controller under Data Protection Legislation.
- 5.6 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 with information, news and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the applicable Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003. You may opt out of receiving certain marketing emails from us by unsubscribing using the links provided in our emails and at the point of providing

your details.

- 5.7 Third parties whose content appears on our Site may use third party Cookies, as detailed below in clause 10. Please refer to clause 10 for more information on controlling Cookies. Please note that we do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 5.8 You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it. Unless we have reasonable grounds to refuse to delete it (where this is permitted under the applicable Data Protection Legislation), we will do so without delay and within no longer than one month from receiving your request.

6. How and Where Do We Store Your Data?

- 6.1 We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the periods specified in the table above (or, where there is no fixed period, the same factors will be used to determine how long it is kept).
- 6.2 We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.
- 6.3 We may store some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.
- 6.4 We may store some or all of your personal data in countries outside of the UK. These are known as "third countries". We will take additional steps to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:
 - 6.4.1 We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of common rules which we are required to follow when processing personal data. For further information, please refer to the [Information Commissioner's Office](#).
 - 6.4.2 We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the [Information Commissioner's Office](#).
 - 6.4.3 We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the [Information Commissioner's Office](#).
 - 6.4.4 Please contact us using the details below in clause 11 for further information about the particular data protection safeguard(s) used by us when transferring your personal data to a third country.
- 6.5 The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:
 - 6.5.1 limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
 - 6.5.2 procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

7. Do We Share Your Data?

- 7.1 We may sometimes contract with other third parties to supply services to you on our behalf, such as sub-contractors. In some cases, these third parties may require access to some or all of your data. 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 If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.
- 7.3 If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described in clause 6.
- 7.4 If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in clause 6.
- 7.5 In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

8. How Can I Access My Personal Data?

- 8.1 If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".
- 8.2 All subject access requests should be made in writing and sent to the email or postal address shown in clause 11.
- 8.3 There is not normally any charge for a subject access request. If your request is "manifestly unfounded or excessive" (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.
- 8.4 We will respond to your subject access request within 5 working days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of progress throughout.

9. Your Right to Withhold Information

- 9.1 You may access certain areas of our Site without providing any data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data.
- 9.2 You may restrict our use of Cookies. 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. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

10. Our Use of Cookies

- 10.1 All Cookies used by and on our Site are used in accordance with current Cookie law.
- 10.2 We may place and access the following first party and third-party Cookies on your computer or device, to facilitate and improve your experience of our Site and to provide and improve our services:

Cookie Name	Category	Description & purpose	Expiry
PHPSESSID	Necessary	Preserves user session state across page requests	Session
ppwp_wp_session	Necessary	Preserves user states across page requests	1 day
_ga	Statistics	Registers a unique ID that is used to generate statistical data on how the visitor uses the Site	2 years
ga#	Statistics	Used by Google Analytics to collect data on the number of times a user has visited the Site as well as fates for the first and most recent visit	2 years
_gat	Statistics	Used by Google Analytics to throttle request rate	1 day
_gid	Statistics	Registers a unique ID that is used to generate statistical data on how the visitor uses the Site	1 day
_pk_id#	Statistics	Collects statistics on the visitor's visits to the Site, such as the number of visits, average time spent on the Site and what pages have been read	1 year
_pk_ses#	Statistics	Used by Piwik Analytics Platform to track page requests from the visitor during the session	1 day

- 10.3 First party Cookies are those placed directly by us and are used only by us. Third party Cookies are those placed by websites, services, and/or parties other than us. These Cookies are not integral to the functioning of our Site and your use and experience of our Site will not be impaired by refusing consent to them.
- 10.4 Before 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 are enabling us to provide the best possible experience and service to you. 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.
- 10.5 Certain features of our Site depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". These Cookies are also shown above. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings, but please be aware that our Site may not work properly if you do so. We have taken care to ensure that your privacy is not at risk by allowing them.
- 10.6 Our Site uses Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our Site is used. 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, 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. Google's privacy policy is available at: www.google.com/policies/privacy
- 10.7 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our Site more quickly and efficiently.
- 10.8 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.

11. Contacting Us

- 11.1 If you have any questions about our Site or this Privacy Policy, please contact us by post at 1 The Bank, Kettering Road, Kettering, Northamptonshire, NN14 1PJ, by email at hello@pixooma.co.uk or by phone on 01536 217007. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under clause 8, above).

12. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). 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.